

D.7 Letters from Federal Agencies, State Agencies, MPO's and Cities

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DEPARTMENT OF THE ARMY
U.S. ARMY ENGINEER DISTRICT, SACRAMENTO
CORPS OF ENGINEERS
1325 J STREET
SACRAMENTO CA 95814-2922

REPLY TO
ATTENTION OF

January 21, 2008

Regulatory Branch (SPK-2004-50362)

Carlos Machado
Federal Highway Administration, Utah Division
2520 West 4700 South, Suite 9A
Salt Lake City, Utah 84118

Re: Comments on the I-15 Corridor Draft EIS and Draft Section 4(f) Evaluation

Dear Mr. Machado:

We are responding to your November 20, 2007 request for comments on the *I-15 Corridor Draft Environmental Impact Statement and Draft Section 4(f) Evaluation*. This project is located on the Interstate 15 corridor between the 12300 South Interchange in Salt Lake County and the South Payson Exit in Utah County, Utah.

We have reviewed the environmental document and have organized our comments in the attached matrix. Our comment matrix includes the Corps' comment number and comment, and the corresponding section, page(s), and line(s) in the DEIS.

Thank you for this opportunity to submit comments. If you have any questions or concerns regarding our comments, please contact me at the Utah Regulatory Office, 533 West 2600 South, Suite 150, Bountiful, Utah 84010, by telephone at 801.295.8380 extension 17, or by email at james.m.mcmillan@usace.army.mil.

Sincerely,

/S/

James McMillan
Senior Regulatory Project Manager
Utah Regulatory Office

Copies furnished:

Merrell Jolley, Utah Department of Transportation, Region Three Headquarters, 658 North 1500 West, Orem, Utah 84057

Robin Coursen, U.S. Environmental Protection Agency, Region 8, 1595 Wynkoop Street, Denver, Colorado 80202-1129

Betsy Herrmann, U.S. Fish and Wildlife Service, Utah Field Office, 2369 West Orton Circle, Suite 50, West Valley City, Utah 84119

USACE Comment Matrix for the I-15 Corridor DEIS and Draft Section 4(f) Evaluation				
Cmt. No.	Comment	Sec.	Page(s)	Line(s)
COE-1	The Corps concurs with the primary project purpose stated in the document, and will utilize this project purpose statement to evaluate the project under our Section 404 regulatory authority.	1.4	1-3	19-21
COE-2	The five secondary purposes or objectives identified in the document appear to be redundant, and, in some instances they are integral parts of the primary project purpose. Therefore, to simplify our environmental analysis, the Corps will only utilize the primary project purpose statement contained in the DEIS to evaluate Section 404 regulatory issues.	1.4	1-3	22-29
COE-3	The Corps concurs with (and appreciates) the alternatives screening process, since it eliminates all alternatives and options that do not meet the primary project purpose (though they may meet one of FHWA's secondary project purposes or objectives).	2.1.1	2-1	35-41
COE-4	In the Provo/Orem area, there would not be a substantial increase in level of service (LOS) between the options with frontage roads and the non-frontage road options. In general, it appears that the highway segments with frontage roads (Options A and B) would only improve by one LOS versus the Option C and Option D configurations (without frontage roads). Interchanges between the frontage road options and non-frontage road options would display minimal improvements in LOS, with one exception. The Sandhill Road/University Parkway intersection would range from LOS D under Option A to LOS F under Option D. Additionally, based on the projected LOS for highway segments, it appears that the proposed 800 South interchange in Orem would actually decrease LOS through the segment (e.g., in Option A).	2.4	2-33 to 2-44	Figs. 2-16, 2-17
COE-5	Per the last comment, in order to better understand the LOS in the Orem area and the effects of the 800 South interchange, the Corps recommends that the EIS team simulate LOS of the segments between University Parkway and the proposed 800 South interchange, and between 800 South and Orem Center Street.	2.4	2-36	Fig. 2-16
COE-6	In comparing the LOS for American Fork Main Street – Option A with the other options, it appears that one LOS would be gained at the intersection of 600 West and American Fork Main Street for Options B and C.	2.4	2-40	Fig. 2-19
COE-7	The Corps is concerned about secondary wetland impacts that would result from induced growth and changes in land use around the proposed new interchanges. We are especially concerned with induced growth around the American Fork Main Street interchange. This	3.1.2	3-4	22-34

USACE Comment Matrix for the I-15 Corridor DEIS and Draft Section 4(f) Evaluation				
Cmt. No.	Comment	Sec.	Page(s)	Line(s)
	interchange would eventually tie into the proposed East-West Connector roadway running along 10 th South in Lehi. We are very concerned about the development that would occur as a result of these roadway improvements, especially in areas currently under agricultural land use. Many of these areas contain farmed wetlands that may fall under the Corps' jurisdiction.			
COE-8	As the team is aware, the Corps must consider other public interest review factors besides those issues pertaining to the Clean Water Act. We are concerned that the 800 South interchange would result in up to 94 housing unit relocations (per Table S-2 in the DEIS). In our permit decision, the Corps must be able to justify these potential relocations by tying them back to the project purpose. However, based on the projected LOS at 800 South interchange and surrounding interchanges (i.e., the University Parkway and Orem Center Street interchanges) the 800 South interchange would not provide an appreciable increase in LOS.	3.4.3	3-33 to 3-35	Table 3.4-1
COE-9	In the affected environment, could the EIS team please explain how stormwater runoff is managed on bridges? Of particular interest are hydrocarbon runoff and de-icing runoff from the project area bridges.	3.12.2	3-151 to 3-161	--
COE-10	Adjacent is defined as neighboring, bordering, or contiguous, per 33 CFR 328.3(c). Neighboring, bordering, or contiguous wetlands are all included in the concept of "adjacent" wetlands per the Corps' regulation.	3.14.1	3-172	17
COE-11	Interchange locations need to be displayed on the wetlands figures so locations of waters of the U.S. are more readily identifiable.	3.14.2	3-176 to 3-179	Figs. 3.14-1 to -4
COE-12	The vast majority of wetland impacts in the common areas of Alternative 4 would occur in Category 3 wetlands (i.e., those wetlands that provide wetland functions, but that occur in highly disturbed areas).	3.14.3 and 3.14.4	3-180 to 3-184	--
COE-13	Approximately 9 acres of additional wetland impacts would result in the construction of Provo/Orem Option A or Option C. Impacts throughout the Provo/Orem area would primarily occur in Category 3 wetlands.	3.14.3 and 3.14.4	3-180 to 3-184	--
COE-14	The American Fork Main Street Interchange area contains a higher percentage of Category 2 wetlands relative to the rest of the study area. Category 2 wetlands can provide habitat for sensitive plants or animals, function at high levels for fish and wildlife habitat, and/or exhibit high ratings for functions assessed using UDOT's Wetland Functional Assessment Method (2006). The American Fork Main Street Interchange – Option A would have the least impact to waters of the U.S.	3.14.3 and 3.14.4	3-180 to 3-184	--

USACE Comment Matrix for the I-15 Corridor DEIS and Draft Section 4(f) Evaluation				
Cmt. No.	Comment	Sec.	Page(s)	Line(s)
COE-15	<p>The Corps has examined waters of the U.S. within the EIS study area through our field review and subsequent verification of the delineation. We have also thoroughly examined potential impacts to waters of the U.S., comparing impacts under the No Build Alternative (Alt 1) and the Build Alternative (Alt 4) and its various options. We have examined these wetland impacts as they relate to the primary project purpose and other social and environmental factors (mentioned in comments above).</p> <p>There are several metrics that have been used throughout this EIS to quantify the improvements to Interstate 15, including Traffic Volumes, Level of Service, Crash Analysis, etc. In the Corps' view, these metrics successfully demonstrate the need to construct the Build Alternative. After accounting for the Utah Transit Authority's FrontRunner commuter rail project, and the positive effects it will have in reducing 2030 peak-hour congestion through the project area, we realize that I-15 improvements are still necessary throughout Utah County and south Salt Lake County. We believe that expanding the existing I-15 corridor is the least environmentally damaging alternative (as opposed to designating a new corridor somewhere else through Utah Valley).</p>	Gen.	---	--
COE-16	The environmental document adequately supports the need for wetland impacts in the Alternative 4 common areas.	Gen.	--	---
COE-17	<p>After accounting for impacts to waters of the U.S., housing and business relocations, and other public interest review factors in the Provo/Orem area, the Corps finds that the Provo/Orem Option D would be the least environmentally damaging, practicable alternative for the area.</p> <p>Per our comments under COE-4, Options A and B would not perform much better than Options C and D. The frontage roads proposed under Options A and B would increase wetland impacts throughout the study area by over 9 acres. Though the bulk of these are disturbed, Category 3 wetlands, they provide important functions and could be avoided (as configured in either Option C or D).</p> <p>The interchange proposed at 800 South (Orem) would result in 77 additional housing relocations under Option C; Option D would have no housing relocations, making it the better option of the two.</p>	Gen.	---	--
COE-18	After accounting for impacts to waters of the U.S., housing and business relocations, and other public interest review factors at the American Fork Main Street Interchange area, the Corps finds that Option A would be the least environmentally damaging, practicable alternative for the area.	Gen.	--	--

USACE Comment Matrix for the I-15 Corridor DEIS and Draft Section 4(f) Evaluation				
Cmt. No.	Comment	Sec.	Page(s)	Line(s)
	<p>Over half of the Category 2 wetlands in the I-15 study area occur in or around this interchange, and wetland impacts for Option A would be approximately 2.4 acres less than wetland impacts under Options B or C. Per our comments under COE-6, Options B and C would not perform much better than Option A.</p> <p>Additionally, Option A would have the fewest housing/business relocations and would not impact any Utah County Agricultural Protection Areas.</p>			
COE-19	Under Alternative 4, selecting Option D in the Provo/Orem area and Option A at the American Fork Main Street Interchange would result in 42.93 acres of direct impacts to waters of the U.S. The Corps finds that these two options would constitute the least environmentally damaging, practicable alternative, after consideration of impacts to the aquatic environment and other public interest review factors.	Summ.	--	--



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 8

1535 Wynkoop Street
DENVER, CO 80202-1129
Phone 800-227-8917
<http://www.epa.gov/region08>

JAN 18 2008

Ref: 8EPR-N

Walter C. Waidehch, Division Administrator
Federal Highway Administration
2520 West 4700 South
Suite 9A
Salt Lake City, UT 84118

John Njord, Executive Director
Utah Department of Transportation
4105 South 2700 West
Salt Lake City, UT 84119

Re: Comments on I-15 Corridor Utah
County to Salt Lake County, Draft
Environmental Impact Statement (DEIS):
CEQ#: 20070498

Dear Messrs: Waidehch and Njord:

In accordance with our responsibilities under the National Environmental Policy Act (NEPA) 42 U.S.C. Section 4231 et. seq., and Section 309 of the Clean Air Act, 42 U.S.C. Section 7609, the U.S. Environmental Protection Agency Region 8 (EPA) has reviewed the I-15 Corridor Draft Environmental Impact Statement (DEIS). The proposed action includes improvements to approximately 43 miles of Interstate 15 in Utah and Salt Lake Counties. The project's southern terminus is the South Payson-I-15 interchange, Exit 248, in the City of Payson; its northern terminus is the 12300 South I-15 interchange, Exit 291, in the City of Draper. The purpose of this project is to address the anticipated north-south mobility needs within the I-15 corridor through the year 2030. The action alternative includes the widening of I-15, total reconstruction of 5 interchanges, modification and improvements to seven interchanges, construction of two potential new interchanges (Orem 800 South and North Lehi), and four different options in the Provo and Orem section of the I-15 corridor that include a potential four-mile frontage road system.

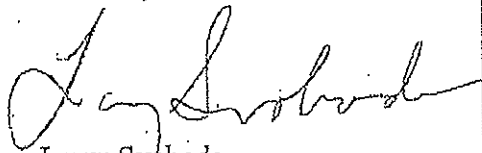
EPA appreciates the opportunity to review this project. We also acknowledge the complexities in designing a highway such as this one in a manner that meets the purpose and need, considers and mitigates environmental impacts and attempts to meet the needs of the local communities (which are often conflicting).

Pursuant to EPA policy and guidance, EPA rates the environmental impact of an action and the adequacy of the NEPA analysis. EPA has rated the action alternative and options as "EC-1" (Environmental Concerns-Adequate). This "EC" rating means that impacts have been identified that should be avoided in order to fully protect the environment. The "1" rating means that no further analysis or data collection is necessary, but clarifying language or information may be necessary. An explanation of the rating criteria is enclosed.

EPA has also evaluated the project "Options" to identify the Least Environmentally Damaging Preferred Alternative (LEDPA) under Section 404 (b) (1) of the Clean Water Act. Our analysis of the wetland impacts from Alternative 4 (Options A, B, C, and D) conclude that Options C and D are clearly the LEDPA, resulting in approximately 30% less direct wetland impacts. These wetland impacts are primarily due to the frontage roads that are proposed for these options. In addition to higher wetland impacts, Options A and B will also have serious indirect impacts to land through the Provo and Orem area. As discussed in the DEIS, these frontage road designs will likely impact commercial businesses, thereby causing economic impacts. Implementation of Option B will also likely result in pressure to redevelop existing agricultural and low density residential lands west of the interchange to commercial uses. We do not have an environmental preference for Option C or D and defer to highway design needs and community preference for either of these two Options. However, we would like to coordinate with Utah Department of Transportation (UDOT) regarding the differences in resource impacts between Option C and D as the final preferred alternative is identified for the final EIS.

We have attached a list of concerns by resource area where clarifying language or information is suggested. We have appreciated the opportunity to participate in this project. If you have any questions or would like to discuss our comments, please contact me at (303) 312-6004 or Robin Courson of my staff at (303) 312-6695.

Sincerely,



Larry Svoboda
Director, NEPA Program
Office of Ecosystems Protection and Remediation

Enclosure

Cc: Greg Punske, FHWA (email) and signed copy
Ed Woolford, FHWA (email)
Carlos Machado, FHWA
Merrell Jolley, UDOT
Betsy Herrmann, U.S. Fish and Wildlife Service (email)
James Mc Millan, U.S. Army Corps of Engineers (email)
Jason Gipson, U.S. Army Corps of Engineers (email)



EPA COMMENTS ON I-15 Corridor DEIS

Air Quality:

- Section 3.8.1.1 Pollutants of Concern / Criteria Air Pollutants: This section adequately explains most of the criteria pollutants related to vehicular emissions. However, there is no listing of sulfur oxides. We recommend that an additional bullet item be inserted with an explanation of SOx emissions.
- Section 3.8.1.3 Air Quality Attainment Status- Particulate Matter Less Than 2.5 Microns in Diameter (PM_{2.5}): "By December 2007, the State of Utah will make recommendations for areas to be designated attainment (meeting the standard) and non-attainment (exceeding the standard)." EPA recommends that this language be updated to address the recent publication of the Utah Area Designation Recommendation for the 2006 PM_{2.5} NAAQS. This document was released on Dec. 18, 2007 and it recommends (pg.39) that the majority of Salt Lake County and the majority of Utah County be listed as two distinct non-attainment areas for PM_{2.5}.

Even though the I-15 Corridor has not yet been *officially* designated as a PM_{2.5} non-attainment area, the DEIS does do an adequate job of explaining EPA and FHWA guidance for qualitative PM_{2.5} hot-spot analysis when transportation conformity does apply for PM_{2.5}. However, Table 3.8.8 does indicate that there will be a 6% increase in PM_{2.5} for the action alternative versus the no action alternative and no mitigation has been discussed regarding this impact. Mitigation measures for PM_{2.5} caused by traffic volume increases should be discussed.

- Section 3.8.2.1 Climate – Consider inserting a figure of a windrose for the local area so that nearby residents can visualize the frequency that they are downwind from the I-15 Corridor.
- Section 3.8.4.1 – Nationwide MSAT Emission Reduction Trends: Please provide a reference for Figure 3.8-1 which shows FHWA's forecasted trends in nationwide tailpipe emissions. Additionally, consider including the Table 3.2-2 Schools and Libraries in this section. This information would be useful in identifying sensitive populations near the highway. Future documents should include other sensitive receptors such as day care centers, hospitals and nursing homes on this list.
- EPA has significant concerns about the MSAT language used in the DEIS. Other comments from Region 8 have also reflected this position. We will schedule a meeting within the next month to facilitate further discussions regarding the EPA's position on MSATs.

Water Quality

- A project cannot further impair a Clean Water Act (CWA) 303 (d) listed water body.

Utah Lake and portions of the Jordan River within the project area are 303 (d) listed waters. Where storm water discharges from the project enter into Utah Lake and portions of the Jordan River impaired for Total Dissolved Solids (TDS), it will be necessary to include additional storm water treatment measures. Without treatment, runoff from the expanded impervious surfaces (especially from winter storm events where deicer has been applied) will contribute further to the existing water quality impairments. It is noted in Section 3.12.4.2 (Surface Water Quality), that additional measures are necessary in these areas as detention will not remove dissolved solids. Removal of dissolved solids does not occur with most stormwater treatment systems and enhanced systems employing particle destabilization (flocculation), multi-chamber treatment trains, or biological uptake may be necessary to remove dissolved solids. Since these practices have not been described, the final EIS will need to be updated with information on the type of stormwater treatment systems which will be effective in removing dissolved solids from discharges to Utah Lake and the Jordan River. In addition, the final EIS should disclose the stormwater treatment system which will ultimately be installed.

- Please disclose the impact of ongoing (versus short term construction) runoff from the highway into wetland areas. These indirect effects should be considered in long term project mitigation.

Indirect Effects/Quality of Life/Smart Growth

- The analysis of indirect effects should not rely solely on compliance with existing comprehensive land use plans. While comprehensive land use plans are an important component of the analysis of indirect effects, compliance with these plans could still result in adverse environmental effects. EPA believes that without these road improvements growth and land use would develop differently in location, density and type of development. The FEIS should identify existing conditions and general trends and forces shaping growth and development in the area; identify land with development potential and most likely locations of growth; identify sensitive environmental resources that may be impacted by such growth, directly and indirectly.
- The FEIS should discuss types of mitigation techniques for environmental impacts from induced growth that could be implemented by UDOT, the Municipal Planning Organizations or local governments. These could include:

- access controls (location of interchanges)
- local land use plans that affect or regulate new development
- zoning controls
- transfer of development rights
- growth management regulation (public facilities ordinances, development moratoria, urban growth boundaries, extraterritorial zoning/annexation)
- resource management and preservation regulations
- land acquisition and conservation easements
- incentives for Brownfields/infill development

- Also, given the additional vehicle miles traveled in the action alternative and potential growth impacts, it would be useful to include a short discussion on realistic types of travel reduction measures that could be implemented in Salt Lake and Utah County and a calculation of percent reduction in vehicle miles that would be possible.

Greenhouse Gases and Pollution Prevention

- A discussion of greenhouse gases should be included. Recent court cases suggest that EISs, even if they reduce emissions, should address this issue. Where possible, please disclose any energy reduction efforts/technologies or other emission reduction strategies that have been, or could be considered for this project.
- The Office of the Federal Environmental Executive released a new Executive Order on January 24, 2007 entitled, "Strengthening Federal Environmental, Energy, and Transportation Management" (EO 13423), which requires, among other things, that all federal agencies:
 - * Reduce energy intensity 30% by 2015
 - * Reduce Green House Gas Emissions through energy savings by 3% annually or 30% by 2105
 - * Build Performance: Construct or renovate buildings in accordance with sustainability strategies, including resource conservation, reduction, and use; citing; and indoor environmental quality.

http://ofee.gov/eo/eo13423_main.asp

The document should address these requirements as appropriate.



United States Department of the Interior

OFFICE OF THE SECRETARY
Washington, DC 20240



JAN 29 2008

9043.1
PEP/NRM

ER 07/1020

Mr. Carlos Machada, MBA
Federal Highway Administration
2520 West 4700 South, Suite 9A
Salt Lake City, Utah 84118

Dear Mr. Machada:

Thank you for the opportunity to comment on the Draft Environmental Impact Statement and Section 4(f) Evaluation for **I-15 Corridor Improvements, Utah and Salt Lake Counties, Utah**. The Department of the Interior (Department) submits the following comments.

General Comments

The Fish and Wildlife Service (FWS) has been a cooperating agency on this project and appreciates the early coordination with the Utah Department of Transportation (UDOT) and FHWA. The Department acknowledges that the upland and wetland wildlife habitat impacted by this project is in a relatively urbanized setting and that habitat quality adjacent to the existing highway is relatively low. Our recommendations are focused on helping UDOT avoid and minimize fish and wildlife-related impacts from this project, particularly in locations where there will be new impacts or there is potential for indirect impacts. We also recommend that UDOT take the opportunity to improve habitat wherever possible, such as: improving fish passage at stream crossings; installing bat roost structures under bridges; controlling invasive weeds and replanting with native species; and replacing riparian vegetation off-site if it must be removed for construction.

The Department recommends that the FEIS expand the discussion of fish and wildlife resources mitigation measures (Section 2.15.4) and include specific recommendations below. We also recommend that the FEIS include a section describing the indirect effects of the project, particularly regarding the proposed new interchanges and frontage roads, on fish and wildlife resources (including wetland habitats).



Specific Comments

Page 2-23, Section 2.2.1.4, Bridges – Hobble Creek is a historic spawning stream for the June sucker and as such has been identified for stream restoration activities by the June Sucker Recovery Implementation Program (JSRIP). The JSRIP is currently involved in restoration efforts on Hobble Creek west of I-15 and has identified the reach of the creek east of I-15 as suitable spawning habitat for the June sucker. We recommend UDOT consider replacing the Hobble Creek culvert with a single span bridge. This would facilitate fish passage, reduce constriction of the creek, improve wildlife habitat connectivity, allow for the passage of stream bedload and woody debris, and contribute to the restoration of this stream.

Page 3-156, Section 3.12.2.5, Flooding – It appears in Figure 3.12-3 that the I-15 corridor also crosses the 100-year floodplain for the Provo River, Dry Creek, American Fork Creek, and Hobble Creek. Permanent structures in the floodplain should be minimized, and measures identified which would mitigate for impacts to floodwater conveyance. Bridges should be single-span and avoid mid-channel support structures.

Page 3-158 Section 3.12.2.6, Groundwater, Figure 3.12-4 - The source credited for this figure, Baskin et al., 2002, is not included by this name in the references. Instead, it is listed as "U.S. Geological Survey, 2002" on page R-xv. They are the same document. The correct link for this document is:
<http://pubs.usgs.gov/wri/wri024115/pdf/wri024115.pdf>

Page 3-168, Section 3.13.2.3, Riparian – How many acres of riparian vegetation will be removed? This question stands for the other vegetation types as well (wetland acreages are disclosed in the wetland section), but riparian habitats are the most rare and critical for fish and wildlife. We recommend a mitigation measure be included that states that riparian vegetation that must be removed will be replaced or enhanced with an equivalent acreage.

Page 3-169, Section 3.13.2.10, Invasive Species – Purple loosestrife does not require perennial open water. It is typically found in a wet meadow habitat.

Page 3-171, Section 3.13.5, Mitigation – The landscaping plan should clearly stipulate that revegetation activities will use only natives, or non-natives that will not naturalize. Further, we recommend that landscaping plans include vegetation which is suitable and attractive for pollinating insects. We support UDOT's intention, as stated in the DEIS (page 3-211), to avoid roadside vegetation planting that would be attractive to wildlife.

Page 3-181, Section 3.14.4.3, North Utah County – An existing Army Corps of Engineers mitigation site exists in American Fork, north of I-15, at Mitchell Hollow Creek (immediately North of Mill Pond). This mitigation site would be impacted by the project.

Page 3-183, Section 3.14.4.6, Indirect Impacts – Roads can have significant impact to water quality and the biological health of streams and wetlands. Given the high

groundwater table, the proximity of wetlands, and the presence of Utah Lake as a 303(d)-listed waterbody (for nutrients and total suspended solids), we recommend a more extensive discussion on water quality mitigation measures that UDOT will employ for this project. Detention basins are certainly an important component, but detention does not remove all materials (e.g., salt, nutrients, pesticides/herbicides) that affect a wetland's functional value and its value for fish and wildlife habitat. Recognizing that the final stormwater mitigation measures have yet to be selected, we recommend that the FEIS include a more complete discussion of the methods which are determined to be most appropriate.

Page 3-183, Section 3.14.4.6, Indirect Impacts – Some of the options associated with the action alternative may have indirect effects on wetlands and wildlife habitat, as indicated in Section 3.1.2.4. For example, the frontage road options (Options A and B) through Provo/Orem would likely facilitate new development west of I-15 (e.g., at the new access at 2000 South). Another example, Option B of the American Fork Main Street exit, “would likely result in pressure to redevelop existing agricultural and low density residential lands west of the interchange to commercial uses” (page 3-5). It is not clear from the DEIS what the current level of access is in these areas, what the current development plans are, and to what extent development in these areas will be facilitated by the new interchanges/frontage roads associated with this project. The FEIS should include an evaluation of the indirect impacts of this change in land use on fish and wildlife resources, including wetland habitats. The wildlife section at this time has no evaluation of indirect impacts and the wetlands section does not address this issue.

Page 3-188, Table 3.15-1 – As of December 6, 2007, slender moonwort (*Botrychium lineare*) has been removed as a Candidate for listing under the Endangered Species Act.

Page 3-200, Section 3.15.2.2, Focused Special-Status Species Surveys – The DEIS states (lines 2-3) that all the potential Ute ladies'-tresses habitat sites were surveyed on eight days in 2006 but only one day in 2007. Two years of surveys of each site is standard FWS protocol for this species. There is likely a good explanation for the difference, and clarification in the FEIS (as well as the Section 7 consultation) would be helpful.

Page 3-202, Section 3.15.2.3, River/Stream Riparian Habitat, Spanish Fork River – The June sucker is not considered extirpated (line 19) from the Spanish Fork River. Individuals have been found in this river during spawning season in recent years. Also, hybrid June-Utah suckers have been found in Spring Creek.

Page 3-211.3, Section 3.15.3, Impacts on Wildlife and Wildlife Habitats - Wildlife mitigation actions for the proposed project are listed as bullets. The public would benefit from a brief discussion of the proposed mitigation actions supported by any relevant studies, and how these are expected to minimize impacts on wildlife.

Page 3-211, Section 3.15.4, Mitigation – The DEIS states (lines 18-19) that preconstruction field surveys will be conducted to determine if the proposed build alternative could disturb active nests of migratory bird species, but does not state what action UDOT would take if there were active nests discovered in these surveys. We recommend the following measures to avoid impacts to migratory birds and to avoid potential construction delays:

- Time tree and shrub removal to occur during the non-nesting season (approximately September 1 – April 30). If this is not possible, conduct preconstruction surveys to determine whether active nests are present; active nests found the area should be left untouched until the young have fledged.
- Raptor nests within the range of disturbance of project activities (refer to the FWS *Utah Field Office Guidelines for Raptor Protection from Human and Land Use Disturbances* [2002]) will be surveyed prior to construction activity if the construction will occur during the nesting season. We recommend identifying nests prior to trees leafing out and surveying again after nesting has begun to determine which nests are active, and what species are utilizing them. If an active raptor nest is identified, UDOT will coordinate with FWS and/or UDWR to determine appropriate buffer distances and duration given the species and nest location.
- Reconstruction of existing bridges will be avoided during nesting season (approximately May – July) to avoid take of swallows. If bridge reconstruction must occur during this period, existing nests must be removed prior to nesting occurring, and deterrence devices (tarps, netting, or other methods such as Bird-X gel) should be employed to deter nesting.

Page 3-211, Section 3.15.4, Mitigation – It is unclear why more preconstruction field surveys for Ute ladies'-tresses would be necessary (lines 20-21), given surveys have already been conducted, unless the construction is not funded and undertaken for many years in the future. We recommend that you coordinate with FWS at that time to determine if updated surveys may be warranted.

Page 3-211, Section 3.15.4, Mitigation – As riparian habitats are rare and valuable for wildlife, we recommend UDOT commit to avoiding removal of riparian vegetation, including willow and cottonwood, where possible and mitigating for riparian vegetation that must be removed by replacing or enhancing with an equivalent riparian acreage.

Page 3-211, Section 3.15.4, Mitigation – We recommend that avoidance and minimization measures and best management practices (including those developed in cooperation with the Utah Division of Wildlife Resources) be more fully described in this section.

Page 3-211, Section 3.15.4, Mitigation – Many bat species utilize bridges and culverts, particularly as natural roost structures are diminishing. We recommend UDOT consider

opportunities to promote and encourage bat roosts under bridges (particularly over waterways) as a low-cost means of benefiting wildlife. The Utah Division of Wildlife Resources may also be helpful in this conservation effort.

SECTION 6(f) COMMENTS

We have found several Land and Water Conservation Fund (L&WCF) sites that could be impacted by this project. They are:

49-00335B-Smith Fields Park
 49-00335I- Utah Lake State Park
 49-00360- Meadows Park

We recommend consultation with the official who administers the L&WCF Program in Utah to determine any potential conflicts with Section 6(f)(3) of the L&WCF Act (Public Law 88-578, as amended). This sections states: "No property acquired or developed with assistance under this section shall, without the approval of the Secretary [of the Interior], be converted to other than public outdoor recreation uses. The Secretary shall approve such conversion only if he finds it to be in accord with the then existing comprehensive statewide outdoor recreation plan and only upon such conditions as he deems necessary to assure the substitution of other recreation properties of at least equal fair market value and of reasonably equivalent usefulness and location."

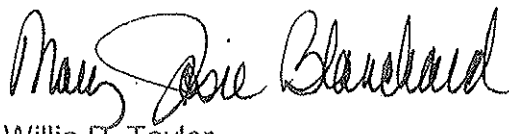
The administrator for the L&WCF program in Utah is Mr. Seth McArthur, Grants Coordinator, Utah Division of Parks and Recreation, 1594 West North Temple, Suite 116, Salt Lake City, Utah 84116. Mr. McArthur's phone number is 801-538-7354.

SECTION 4(f) COMMENTS

Following our review of the Section 4(f) Evaluation, we concur that there is no feasible or prudent alternative to the Preferred Alternative selected in the document, and that all measures have been taken to minimize harm to these resources. We acknowledge that you have consulted with the Utah State Historic Preservation Office, and will be prepare a Memorandum of Agreement to minimize adverse effects to historic properties if needed.

We appreciate the opportunity to provide these comments. If you need further assistance regarding the U.S. Geological Survey comments, please contact Lloyd Woosley, USGS, at (703) 648-5028; the wildlife comments, please contact Betsy Herrmann, FWS, at (801) 975-3330 x139; the LWCF comments, contact Terree Klanecky (402) 221-1556; and for Section 4(f) comments, please contact Roxanne Runkel, NPS, at (303) 969-2377.

Sincerely,


for Willie R. Taylor
Director, Office of Environmental
Policy and Compliance

References:

The Internet link for the second USGS 2007 citation on page R-xx is no longer valid. The correct link is: <http://dwrcdc.nr.utah.gov/rsgis2/Search/SearchVerts.asp>.

cc:

Merrell Jolley, P.E.
I-15 Corridor Project Manager
Utah Department of Transportation
4501 South 2700 West
Salt Lake City, Utah 84114-1245



IN REPLY REFER TO:

CA-1300
ENV-7.00

United States Department of the Interior

OFFICE OF THE SECRETARY
Program Director
CUP Completion Act Office
302 East 1860 South
Provo, Utah 84606-7317



JAN 11 2008

Mr. Carlos Machado
Federal Highway Administration
2520 West 4700 South, Suite 9A
Salt Lake City, UT 84118

Subject: Draft Environmental Impact Statement (DEIS), I-15 Corridor Utah County to Salt Lake County, (FHWA-UT-EIS-07-01-D); Project No. IM-NH-15-6(149)245E)

Dear Mr. Machado:

We have reviewed the subject DEIS and offer the following comments under the authority of the National Environmental Policy Act (42 USC 4332(2)(c) (NEPA). As a Participating Partner in the June Sucker Recovery Implementation Program (JSRIP) our comments are focused on the evaluation of impacts of the proposed project on the survival and recovery of the endangered June sucker (*Chasmistes liorus*) which exists naturally only in Utah Lake and currently is known to spawn in the Provo River.

In addition, our office is the lead agency for preparation of NEPA compliance documentation for plans by the JSRIP to restore aquatic and physical habitats in Hobble Creek (Springville, Utah County), a potential spawning tributary, to benefit the June sucker. We recently completed the public scoping process for that project where we invited public comment on our conceptual restoration plans. UDOT has been invited to participate. For your information our concepts for Hobble Creek habitat restoration are in the enclosure, which was presented at our scoping meeting.

Our goal is to re-establish June sucker spawning in Hobble Creek as a necessary recovery action for the species. Your DEIS acknowledges that Hobble Creek may have been an historic June sucker spawning stream. At present, Hobble Creek crosses I-15 through a culvert just south of the North Springville Exit (No. 261). The freeway is planned to expand to 4 general purpose traffic lanes plus an express lane, in each direction, for a total of 10 lanes at this location.

As you will note in the enclosure, we propose to improve the lowest reach of Hobble Creek from its Utah Lake terminus eastward to I-15. Our studies indicate that suitable spawning habitat exists in Hobble Creek east of I-15 which increases the importance of our Hobble Creek restoration plans. In part, our restoration project will facilitate access by June sucker from Utah

Lake to these valuable spawning reaches. Our goals for Hobble Creek would be materially enhanced if FHWA/UDOT would consider replacing the existing Hobble Creek culvert through I-15 with an open-span bridge design as part of the I-15 expansion. An open-span bridge would eliminate the existing culvert which potentially blocks fish passage and would allow a more natural Hobble Creek to reestablish in a manner favorable to June sucker. We would appreciate the opportunity to discuss this issue with you further.

Meanwhile, we have reviewed the pertinent sections of the DEIS that address the endangered June sucker and we note that no direct impacts to the species are predicted (Table 3.15-2). We generally concur that the I-15 expansion as planned should not directly impact habitat of the June sucker in Utah Lake, or the Provo River.

The potential for indirect impacts to the species is, however, indicated in Table 3.15-2. However, we find no discussion of indirect impacts on fish and wildlife species, particularly the June sucker, in the text of the DEIS. We recommend that indirect impacts be discussed in detail in section 3.15.3.2 in the Final EIS.

We assume that indirect impacts could mean impacts during the construction of various bridge expansions, particularly over the Provo River. While Best Management Practices (BMPs) for bridge construction are mentioned in 3.15.3.2, they are not listed in this DEIS. We are confident FHWA/UDOT are very experienced in avoiding adverse impacts to water bodies during bridge construction and undoubtedly have developed advanced practices for such work. BMPs applicable to I-15 need to be included in the Final EIS.

In order to minimize adverse indirect impacts on the endangered June sucker, we recommend the following BMPs be adopted for bridge expansion work associated with this project.

- Bridge abutments should be constructed on uplands without need for encroachments into the stream channel (including side channels). Bridges should span the entire channel width without need for supports in mid-channel. Avoid any blockages or construction activities in the active stream channels.
- If necessary to encroach on stream channels (including side channels), temporary cofferdams should be constructed to enclose all construction activities to prevent escape of polluting sediments, oils, etc.
- Temporary silt fencing should be installed alongside channels, both up and downstream from construction sites, to prevent runoff of any sediment, construction water, cement, and other pollutants into the stream channel, including side channels.
- If possible, confine construction activities to the August to March time period. We realize that this may not be possible with a project of this scope. However, these months are outside the spawning period for June sucker in the Provo River, or other rivers, and would largely avoid any potential for adverse impacts on June sucker in Utah Lake tributaries.

Our feasibility studies¹, completed in 2002, recommended four Utah Lake tributaries for further consideration for habitat restoration to benefit June sucker (see enclosure). Two of these—American Fork River and Spanish Fork River—will be subject to bridge expansions associated with I-15. While our program continues to evaluate possible June sucker use of these rivers, we are currently focused on Hobbie Creek and have no plans at the present time to implement habitat improvements in these tributaries. Nevertheless, we recommend these other rivers be protected from adverse project impacts to the maximum extent possible during I-15 expansion by adopting the construction considerations listed above.

We note in the Table of Contents that Mitigation measures for wildlife impacts appear on page 3-211. However, we cannot find this page in the pdf version of the DEIS on your website. Please ensure that mitigation measures for fish and wildlife are clearly displayed in the Final EIS. For emphasis, we recommend that an appendix, or other separate section, be prepared that specifies all environmental and mitigation commitments that UDOT/ FHWA intends to implement for this project.

We also note that UDOT/FHWA is preparing a Biological Assessment (BA), pursuant to the Federal Endangered Species Act, that will focus on project impacts to endangered and threatened species. While the DEIS contains generally adequate information on the June sucker, the BA should describe and evaluate, in detail, the habitat, species biology and expected project impacts on all listed species, including the June sucker. We request the opportunity to review and comment on the Biological Assessment when it is complete.

In closing, you will note from our enclosure that one of our project purposes is to offer opportunities to partner agencies to provide other public benefits consistent with our need to facilitate June sucker spawning in Hobbie Creek. These might include offsetting environmental mitigation requirements. We would be willing to discuss such opportunities with FHWA/UDOT.

Thank you for your consideration of these comments. Please contact Mr. Ralph Swanson at 801-379-1254 for any discussion of these matters.

Sincerely,

REED MURRAY

Reed R. Murray
Program Director

Enclosure

cc: Mr. Merrell Jolley, Utah Department of Transportation, 658 North 1500 West, Orem, UT 84057 (w/encl)

¹ June Sucker Recovery Implementation Program. 2002. Feasibility analysis of establishing an additional spawning location to benefit the endangered June sucker. Prepared by Bio-West. July 2002. 71pp + App.

✓ Mr. Reed Harris, June Sucker Recovery Implementation Program, Dept. of Natural Resources, P.O. box 145610, Salt Lake City, UT 84115 (w/encl)

Assistant Secretary - Water and Science, Washington, DC
Attention: Ms. Amy Holley, ms-6640MIB (w/encl)

NEED FOR THE PROJECT

- To provide additional spawning, nursery, and rearing habitat for June sucker in a tributary of Utah Lake.

PURPOSES OF THE PROJECT

- To achieve one of three de-listing criteria from the June Sucker Recovery Plan.
- To create a natural meandering stream channel that maintains flow to Utah Lake and provides quality habitat for the June sucker.
- To facilitate the environmental commitment for delivery of Central Utah Project, Utah Lake System, water to Utah Lake via Hobble Creek to assist with recovery of the June sucker.
- To create and enhance wetlands and wildlife habitat on the shores of Utah Lake.
- To offer opportunities for partners to develop public recreation and access to Utah Lake compatible with the project need.
- To minimize environmental impacts, such as flood impacts, during construction and operations.

POTENTIAL ENVIRONMENTAL IMPACT ISSUES

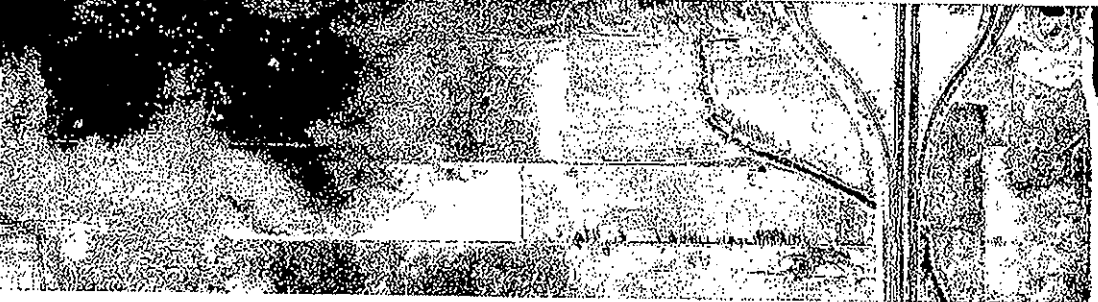
- Public Access
- Livestock Grazing
- Flood Control
- Hunting, Fishing, and Wildlife Viewing
- Mosquitoes
- Weed Control
- Hydrological Changes

PROJECT SCHEDULE

- Project Scoping Meeting: December 2007
- Draft Environmental Assessment: April 2008
- Final Environmental Assessment: July 2008
- Department of Interior Decision: Late July 2008
- Construction: Fall 2008

WE WANT YOUR INPUT!

Please use the comment form on the next page to give us your comments regarding environmental impacts in writing. Also, tell us if you have additional alternatives for consideration or other concerns that need to be addressed. If you need more time, please send us your comments via mail to the address provided or email Ralph Swanson (rswanson@ucsbpr.gov) by January 4, 2008.



Hobble Creek Stream Restoration Project Public Scoping Meeting Comment Form

NAME: _____ ADDRESS: _____

REPRESENTING (optional) _____ Self _____ Other (please specify) _____

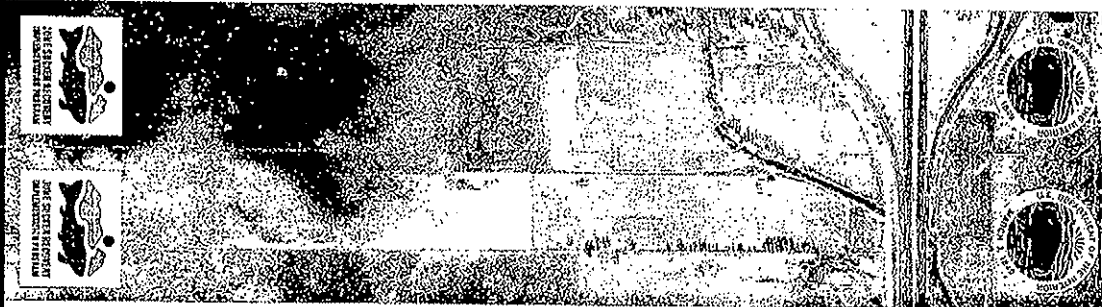
COMMENTS OR CONCERNS:

THANK YOU FOR YOUR TIME AND PARTICIPATION!

Please detach this page, fold in thirds, seal loose edge, affix postage, and mail.

3500
Postage
Paid

Ralph G. Swanson
U.S. Department of the Interior
CUP Completion Act Office
302 East 1860 South
Provo, Utah 84606-7317



Hobble Creek Stream Restoration Project Public Scoping Meeting Handout

WELCOME!

The U.S. Department of the Interior's Central Utah Project (CUP) Completion Act Office, on behalf of the June Sucker Recovery Implementation Program (JSRIP), is preparing an Environmental Assessment for public review on a proposed stream channel design project for lower Hobble Creek, a tributary to Utah Lake in Springville, Utah. The Environmental Assessment will be prepared under the provisions of the National Environmental Policy Act (42 U.S.C. 4321 et seq.) and the Council on Environmental Quality regulations (40 CFR 1500).

BACKGROUND

The JSRIP has identified Hobble Creek as a potential site for the establishment of a self-sustaining population of June sucker (*Chasmistes liorus*) in the Utah Lake system outside of the Provo River. The June sucker is endemic to Utah Lake and was listed as endangered with critical habitat on April 30, 1986. Habitat restoration on Utah Lake tributaries is a major focus of the JSRIP.

The JSRIP has purchased a 21-acre property adjacent to Hobble Creek between 145 and Utah Lake in Springville, Utah. The current stream channel is highly entrenched with high lateral dikes providing very little habitat for spawning or juvenile June sucker. The JSRIP intends to relocate the lower reach of Hobble Creek into a new channel designed in such a way that best suits the spawning and rearing of June sucker while minimizing environmental impacts.



Page 1



3600 South 700 West

P.O. Box 30810

Salt Lake City, UT 84130

Ron Clegg
I-15 Corridor EIS
Parsons Brinkerhoff
488 East Winchester St., Suite 400
Murray, UT 84107

Date 1/11/08

RE: Draft Environmental Impact Statement (DEIS) for the I-15 Corridor Utah County to Salt Lake County Project

Dear Mr. Clegg,

The Utah Transit Authority (UTA) has reviewed your DEIS for the I-15 Corridor Utah County to Salt Lake County Project in Utah. We are providing the following comments for your consideration.

UTA would like to first acknowledge participation as cooperating agency in the earliest stages of the I-15 Corridor EIS project, working with FHWA and UDOT toward a multimodal alternative to be advanced to the Final Environmental Impact Statement (FEIS). UTA also acknowledges that in March of 2007, following the identification of a preferred alternative that included both a highway and transit solution, UTA and UDOT mutually agreed to separate the final stages of environmental evaluation work and publish separate and independent environmental reports. This decision was made due to differences in funding and schedule of the construction of the final projects.

UTA's comments reflect various UTA owned rail corridors and other transit projects located in or near the project limits of the I-5 project. Those corridors and projects include:

1. *Future* Provo to Payson FrontRunner (Phase II MAG Long Range Plan)
 - a. Former UPRR Tintic Industrial Lead property
2. Provo to Salt Lake FrontRunner Final Environmental Study Report (FESR) and construction of the Provo to Salt Lake FrontRunner Commuter Rail line
 - a. UPRR Provo Industrial Lead
 - b. UPRR Sharp Subdivision
3. *Future* Light Rail extension Preserved Railroad Corridor (Phase III MAG Long Range Plan)
 - a. Former UPRR Provo Industrial Lead
4. Orem Intermodal Center

The Provo to Salt Lake FrontRunner Commuter Rail project completed its environmental analysis in the fall of 2007 and subsequently published FESR. UTA has previously purchased the other railroad corridors for the preservation of future rail transit projects. UTA is currently engaged in the purchase of property for the future location of the Orem Intermodal Center, located at approximately 800 North and Geneva Road, Orem. This station site was identified in both the original I-15 EIS study documents and identified as the preferred alternative in the FESR published by UTA.

General Comments

UTA/ UDOT structure and crossing coordination will be essential to the I-15 project where it crosses the future segments of Frontrunner as well as other railroad property owned by UTA including the former UPRR Tintic Industrial Lead and former UPRR Provo Industrial Lead. Roadway designs for the I-15 corridor should protect and preserve these railroad corridors including but not limited to the existing corridor widths and minimum envelope heights for future planned rail transit operations. UTA foresees that extensive coordination efforts will be required to ensure roadway design solutions that provide for placement of structural elements and crossing devices that are adequate for planned future rail transit operations. UTA anticipates high levels of coordination at the following crossing locations of I-15 and UTA owned rail rights-of-way:

- 1) North Payson Interchange ~Station 580
- 2) SR-164 Benjamin Interchange ~Station 705
- 3) 7300 South Overpass ~Station 765
- 4) Tintic Industrial Lead Overpass ~Station 825
- 5) 400 North Overpass ~Station 850
- 6) Spanish Fork Main Street ~Station 910
- 7) I-15/Railroad Overpass ~Station 945

Specific Comments

- **Options A and C of the American Fork Main Street Interchange** as shown in this document would require users of the American Fork FrontRunner Station (as shown UTA's FESR) to travel out of direction by distances ranging from 1.6 to over 3 miles.
 - Option A is the least desirable for efficient access to the planned UTA FrontRunner Commuter Rail Station. This option maintains both the current alignment of American Main Street west of I-15 as well as the existing at-grade crossing the 7350 West (American Fork). With future residential development in the area and additional vehicular traffic along 1000 South (Lehi)/200 South (American Fork) from proposed improvements to that road, the at-grade crossing at 7350 West (American Fork) would be inadequate to handle the average daily traffic volumes.
 - Option B as shown in this document the represents the original design that was proposed by UTA and UDOT early in the I-15 EIS process. While

this option is still UTA's preferred option because it represents the shortest driving distance from I-15 to the planned station location, UTA also recognizes that since the establishment of this option, environmental impacts have been identified related to agriculturally protected lands that have forced UDOT to consider other options. Option B as it shown in this document also introduces an additional at-grade crossing to accommodate a connection between traffic moving between 1000 South (Lehi)/200 South (American Fork) and American Fork Main Street west of I-15. In order to have new at-grade crossings approved by UPRR and UTA the applicant for the closing typically is required to identify at least two existing at-grade crossings in relative close proximity to the proposed new crossing that can be permanently closed. This document has not indicated which existing crossings UDOT and FHWA intended to close in order to receive approval for the new crossing.

- Option C as shown in this document has the longest out of direction travel for rail commuters driving to the planned station from I-15. However, UTA is aware that there are two other separate ongoing UDOT environmental and design studies. One is the 1000 South (Lehi)/200 South (American Fork) widening from the interchange to Redwood Road in the west. The other project is the Vineyard Connector which is proposed to provide an arterial connection from Vineyard (the former Geneva Steel site) to the newly widened 1000 South/200 South. UTA staff has seen preliminary designs for the Vineyard Connector north of 1000 South/200 South that would provide a grade separated crossing of the UPRR/UTA tracks and ultimately connect to the American Fork Main Street Interchange Option 'C'. In light of these ongoing projects and potential designs, UTA would support Option 'C' as shown in this document. Again, extensive coordination efforts will be required to ensure roadway design solutions provide for placement of roadway structural elements and rail crossing devices that are adequate for planned future rail transit operations.

- **Page 2-15, Alternative 4: I-15 Widening and Reconstruction, plus CRT-**
Please update to reflect the information included in the Provo to Salt Lake FrontRunner FESR. UTA's Current plan for operating schedule incorporated in UTA's FESR has FrontRunner trains operating every 15 minutes during the a.m. and p.m. peak hours (in peak direction), every 30 minutes during off-peak hours during the day, and every 60 minutes during the evening hours (7 p.m. to 11 p.m.) with hourly Saturday service.
- **The former UPRR Provo Industrial Lead** railroad property currently extends from Salt Lake County into Utah County across the Point of the Mountain on the east side of the existing I-15 corridor. This railroad property and is not labeled in the DEIS as UTA property. Please label throughout including where it crosses under the I-15 alignment at station 2190 and 2105 as "UTA Owned Property".

- **The former UPRR Provo Industrial Lead** property in the south Draper and northern Lehi area that will be potentially impacted by the I-15 project (approximately stations 2480 to 2410) was originally land grant property and was originally 200 feet in width (100 feet on either side of the existing rail centerline). Some of the potentially impacted property was purchased from UPRR for the original construction of I-15 in the 1960's. This transaction took place prior to UTA ownership. UTA uses UPRR valuation map data to indicate current ownership and land representing the property that was sold to UTA. The I-15 DEIS document says that the property information is unavailable for a portion of this area. UTA requests that UDOT coordinate with UTA to develop cooperative design resolutions and use the valuation maps to understand the property designations through this section of the study area.
- **Former UPRR Provo Industrial Lead** in northern Lehi crosses under the I-15 alignment in two locations within the limits of the I-15 project. Please coordinate with UTA to find design solutions that ensure roadway design solutions provide for the placement of structural elements and crossing devices that are adequate for future planned rail transit operations.
- The drawings that show the tie-in of the new alignment of Minuteman drive to Highland Drive at **14600 South** appear to illustrate a misalignment with UTA's double track structure on Highland Drive. Please adjust this design and coordinate with UTA to find design solutions that are adequate for future planned rail transit operations.
- The proposed crossing structures at I-15 at approximate **stations 2190 and 2105** will require UTA coordination to ensure design resolutions that protect and preserve existing corridor widths and minimum envelope heights for rail future planned rail transit operations.
- **The alignment of the proposed 800 South Interchange** in Orem is located in close proximity to the planned Orem Intermodal Center. The Orem Intermodal Center is expected to serve the Provo to Salt Lake FrontRunner Commuter Rail, the Provo-Orem Bus Rapid Transit line, local bus service as well as park and ride capacity. The Intermodal Center as it has been proposed in UTA's Provo to Salt Lake FrontRunner FESR is intended to support dense mixed-use and transit oriented development. UTA is currently engaged in negotiations with Orem City and Utah State University to buy land for the development of the Intermodal Center. UTA feels that with inclusion of the access road (immediately west of the proposed railroad viaduct) the proposed 800 South Interchange serves the planned Intermodal site very well. The interchange provides UTA with additional access to the UVSU campus for the UTA vehicles that will be required with the students, faculty and staff that will be arriving at the Intermodal Center. As the UTA staff looked at the proposed alignment of the 800 South Interchange they noticed that the alignment required partial land takings of a few residences along 800 South (east of Geneva Road and immediately north of the alignment). As UDOT begins to prepare the final design and property acquisition for this particular interchange,

UTA would appreciate the opportunity to coordinate with UDOT to find design solutions that may provide for the placement of structural elements that are adequate for future planned rail transit operations as well as any potential transit oriented development opportunities.

UTA appreciates and looks forward to the opportunity to cooperate with UDOT and FHWA in the future expansion of the I-15 corridor. We anticipate that both the highway and rail improvements will bring much need relief to an ever burdened transportation system.

Sincerely,

A handwritten signature in cursive script, appearing to read "Ralph Jackson".

Ralph Jackson
Deputy Chief Major Program Development
Utah Transit Authority

cc: Merrell Jolley
Steve Meyer
Hal Johnson

From: "Adam Cowie" <acowie@lindoncity.org>
To: <i15utahcounty@utah.gov>
CC: "Woody Mataele" <woody@lindoncity.org>, "Merrill Jolley - UDOT" <mjolley@utah.gov>, "Mark Christensen-JUB" <MLC@JUB.com>, "Ott Dameron" <odameron@lindoncity.org>
Date: Monday - January 7, 2008 11:19 AM
Subject: I-15 widening comments from Lindon City

Please accept this email as official public comment from Lindon City - concerning the I-15 widening project.

Lindon City is grateful for the efforts that have been made towards this project. We understand the need for the widening of the freeway - and desire to be a willing participant in the planning, design, and construction phases of the widening project.

Upon review of the document we found that the 'All American Gymnastics' building located at 95 South 1400 West (Western Coil Rd) - (but the road is identified incorrectly on the attached map as "100 South") is not identified as a taking - and does not show up on your air photos. The project shows this lot and another vacant lot as future detention basins. (parcels numbers 29 and 165 on the tables provided in your EIS). Note that the maps also have some of the Lindon roads mis-labeled.

Please note this mistake for parcel #165 as it is not a vacant parcel. If constructed as shown, there is a complete taking of a two-year old commercial building that now houses the All American Gymnastics building.

Of additional notice and concern are the following issues:

1. Landscaping of off-ramps: Lindon had previously invested a large amount of money and interest in the landscaping around the PG/Lindon off ramp. The proposed construction shows that it will eliminate much of this landscaping on the four corners of the off-ramp. The City desires to know if the landscaping will be replaced or repaired as much as possible under this project? Will landscaping of the 1600 North exit also occur? If there are no plans to landscape the off-ramps after construction, how can Lindon (and potentially Pleasant Grove and Orem) participate with UDOT to see that the off-ramps are re-landscaped (or newly landscaped) in a similar fashion?

2. Lindon Heritage Trail under-crossing: The City currently has plans for the Lindon Heritage Trail to cross Geneva Road and then turn south along Geneva Rd to cross under the freeway and then head out towards Utah Lake. The City has purchased right-of-way on the west side of the freeway leading up to the overpass - and has a majority of the needed right-of-way on the east side of the freeway. It is critical for the trail project to ensure that the bridge structure for the I-15 crossing of Geneva Road is sufficiently widened to accommodate the trail under-crossing needs. The current proposal for the trail route will take it on the west side of the railroad tracks and under the freeway on the western most portion of the bridge structure.

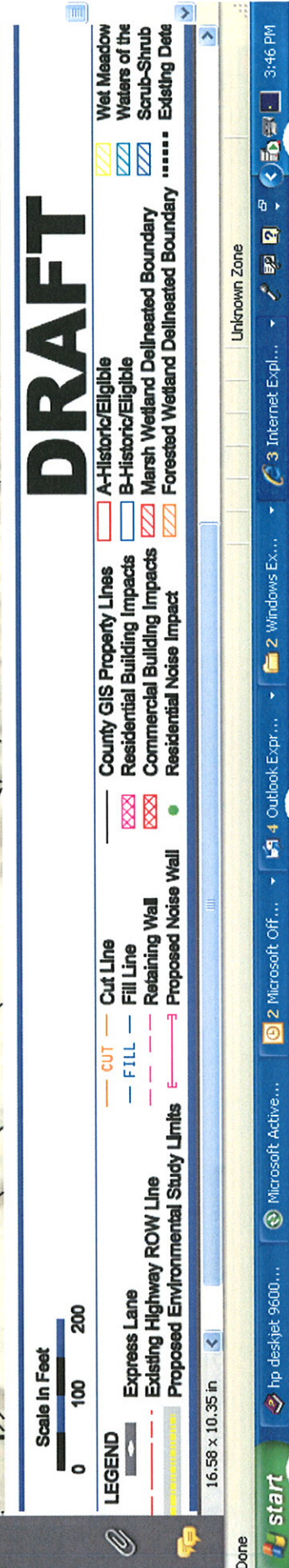
We would be happy to have you meet with our project engineers to discuss this trail crossing need - but want to make sure it is on the record for the widening project so that the structure will consist of adequate width and design to accommodate the future trail crossing. Please contact us on this specific design issue.

3. Pedestrian improvements at over-pass crossings: The City is interested to know if pedestrian accommodations (sidewalks or other) are being incorporated in the reconstructed over-passes at 200 South and 2000 West. The over-passes are currently very narrow and are not wide enough for safe pedestrian crossing in either direction. Please inform us of any proposed pedestrian improvements on the 200 South and 2000 West crossings - or if no improvements are planned, how they could be added to the project.

Thank you for your time and attention to these issues.

Adam Cowie
Lindon City Planning & Development Director
100 N. State Street
Lindon, UT 84042
Phone (801)785-7687
Fax (801)785-7645
acowie@lindoncity.org

PARCEL #	PARCEL AREA (SQ FT)	AREA OF IMPACT (SQ FT)	GIS PARCEL ID	PROPERTY OWNER	PROPERTY DESCRIPTION	NUMBER OF BUILDINGS IMPACTED	FULL NAME OR PARTIAL NAME	Hwy SHEET NO.
129	60034	6426	104377	ALLEN, RICHARD	COMM UNKNOWN-MISC		PARTIAL	057
130	7336	7336	105746	FALCON POINT LTD	VACANT		PARTIAL	051
131	43534	5913	105471	LUI, SIOBE K & CHARLENE B JT	VACANT		PARTIAL	059
132	22652	2454	105632	JALENA LC	COMM UNKNOWN-MISC		PARTIAL	053D
133	31462	4704	105545	BOWMAN BY DESIGN LLC	COMM UNKNOWN-MISC		PARTIAL	050
134	18400	1122	105620	IMPERIUS SANIT, INEZA ET AL	RESIDENTIAL SINGLE		PARTIAL	053D
135	77103	26590	105418	DARRYL K CHRISTENSEN PROPERTIES LC	COMM-INDUSTRIAL		PARTIAL	059
136	289715	14874	110130	WOLF MOUNTAIN PRODUCTS LLC	VACANT		PARTIAL	059
137	155716	69	110298	COMMON AREA			PARTIAL	055
138	43596	6505	110418	JACOBSON, JAMES B	COMM SERVICE STATION OR GAR		PARTIAL	055
139	7700	28	112580	LI EVELYN	RES SINGLE PUD		PARTIAL	055
140	189225	844	112923	BIG STORAGE LLC	COMMERCIAL OFFICE		PARTIAL	055
141	8413	461	114201	BILLS AUTO PARTS	COMM STORAGE		PARTIAL	053.1
142	685508	122265	114480	JARRETT, MICHAEL T & MARCIA Y JT	VACANT		PARTIAL	051
143	14055	143	115770	COMMON AREA			PARTIAL	055
144	37548	747	115681	ROFFORD, JERRY N A NED M TEE	COMM SERVICE STATION OR GAR		PARTIAL	055.059
145	90713	37548	115946	HEINER, DOUGLAS D & SANDRA L TEE	COMM STORAGE		PARTIAL	055
146	46546	126	116948	REAL TOUCH INC ET AL DBA	COMM-INDUSTRIAL		PARTIAL	055
147	45706	1393	116948	DEBISTO, NATELY & CHRISTOPHER JT	RES SINGLE PUD		PARTIAL	055
148	630	41	115712	B O C ENTERPRISES	COMM RETAIL		PARTIAL	054
149	81407	61407	116234	TIMPANOGOS VILLAGE MHP LLC	MOBIL HOME-PARK		PARTIAL	054
150	8500008	8255	120095	GREENFIELD INVESTMENTS L.C.	COMM-INDUSTRIAL		PARTIAL	055
151	99955	6995	122023	COMMON ARE			PARTIAL	059
152	740	28	122690	ALABAMA METAL INDUSTRIES CORPORATION	VACANT		PARTIAL	059
153	584118	17412	123054	JUDKINS ENTERPRISES LLC	COMM UNKNOWN-MISC		PARTIAL	059
154	29130	2498	123157	JONES, RANDALL B & JULIE D JT	VACANT		PARTIAL	057
155	2953307	295399	129623	ANDERSON BOYD AND BONS INC	AGRICULTURAL		PARTIAL	057
156	65726	3397	129510	MANQUIM PROPERTIES LC	COMM UNKNOWN-MISC	1	PARTIAL	053.1554
157	109574	15924	129539	AI COMMERCIAL L.L.C.	RES SINGLE PUD		FULL	059
158	630	40	130338	JENSEN, MINOY ET AL	COMM UNKNOWN-MISC		PARTIAL	055
159	8709	253	130401	HEINER, DOUGLAS DEE	VACANT		PARTIAL	055
160	17128	845	130462	MAHER, STEVE C	RESIDENTIAL SINGLE		PARTIAL	053D
161	630	63	130462	SCHLITZ, JOSHUA P & BRITNEY S	RES SINGLE PUD		PARTIAL	055
162	630	63	130462	UNKNOWN - CITY OR STATE	ROADWAY		PARTIAL	057.060
163	1315897	71240	130582	GLIZMAN, HENRY D	RESIDENTIAL SINGLE		PARTIAL	053D
164	8468	1244	130599	C AND J REAL ESTATES LLC	VACANT		FULL	053D
165	52130	39127	132465	TRAFALGAR PLACE L.C.	VACANT		PARTIAL	054
166	41898	3979	132789	LANIER, DELIA B	RESIDENTIAL SINGLE	1	FULL	054
167	8750	8704	134070	HAUSER, DEBRA A	VACANT		PARTIAL	057.052
168	11352	1052	134108	HAUSER ENGINEERING INC	VACANT		PARTIAL	053
169	37379	2081	134465	G & L EQUIPMENT LC	COMM-INDUSTRIAL		PARTIAL	054
170	21707	2099	134673	SUN LC	VACANT		PARTIAL	054
171	43354	10748	134680	U.S. CONSTRUCTION INC	COMM-INDUSTRIAL		PARTIAL	059.050
172	85156	7674	135047	BRADY INVESTMENTS LC	COMM UNKNOWN-MISC		PARTIAL	054
173	169234	9907	135381	AMARCO INVESTMENT LG ET AL	COMM-INDUSTRIAL	1	FULL	056.050
174	105653	2316	136203	STATE OF UTAH ET AL DN OF				056.1506
175	26507	758	136952	LONDON CITY				053
176	69559	1179	137090	VALGARDSON INVESTMENT PARTNERS LTD	COMM CONVERSIONS		PARTIAL	055
177	439071	628	139683	U S CONSTRUCTION INC INCORPORATED	VACANT		PARTIAL	055
178	76153	3155	140725	LEGACY WALATCHI LC ET AL ANIT	COMM UNKNOWN-MISC		PARTIAL	050
179	76153	3155	140725	JUDKINS ENTERPRISES LLC	VACANT		PARTIAL	055
180	45437	558	140768	JENSEN, MARK M & REBECCA L JT	COMM UNKNOWN-MISC		PARTIAL	055
181	38516	4224	140348	SUN LC	COMM UNKNOWN-MISC		PARTIAL	054
182	6471	6766	141230	MOUNTAIN LANDS ENTERPRISES LLC	COMM-INDUSTRIAL		FULL	054
183	30589	2806	141715	SECHAUER SAUER FAMILY PARTNERSH0574NT	COMM-INDUSTRIAL		PARTIAL	057.2.059
184	695729	87404	142247	JUDKINS ENTERPRISES LLC	VACANT		PARTIAL	055
185	44462	1133	142772	ALEXANDERS HOLDINGS INC	AGRICULTURAL		PARTIAL	054
186	180596	19050	144005	JUDKINS ENTERPRISES LLC	VACANT		PARTIAL	055
187	112254	11311	144508	INC COLA LARRY & JOANNE JT	COMM-INDUSTRIAL		PARTIAL	055
188	29859	42917	144644	UTAH NATIONAL PARKS COUNCIL INC BOY	VACANT		PARTIAL	055
189	839443	89151	144619	COOKS LAND AND INVESTMENT	COMM UNKNOWN-MISC		PARTIAL	057.2.058





SARATOGA SPRINGS

January 8, 2008

I-15 Corridor EIS
c/o Parsons Brinkerhoff
488 E. Winchester St., Suite 400
Murray, Utah 84107

Re: I-15 Widening & Reconstruction

To Whom It May Concern:

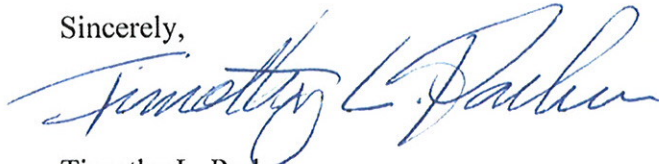
The City of Saratoga Springs recognizes the need for north/south mobility along the I-15 Corridor. Current residents of this area, and specifically of Saratoga Springs, anticipate the widening and reconstruction of the I-15 Corridor. This project will contribute to improving the congestion on existing roadways and assist in handling future transportation needs and growth in the region. The purpose of this letter is to outline the main points of the City's position on the Environmental Impact Statement (EIS) for the I-15 Corridor.

1. The No Build alternative is required to be evaluated as an alternative in the EIS and is also used as a basis for comparing the proposed build alternatives. The City has the following comments with regard to this alternative:
 - a. Saratoga Springs is not in favor of this alternative. If nothing is done to the I-15 Corridor, the future transportation needs and growth in the region will not be appropriately addressed.
2. The I-15 Widening & Reconstruction alternative includes the widening of I-15; total reconstruction of 15 interchanges, including three options for the American Fork Main Street interchange; modification and improvements to seven interchanges; construction of one new interchange (North Lehi); and four different options in the Provo and Orem section of the I-15 Corridor that includes one potential new interchange (Orem 800 South) and a four-mile frontage road system. This proposal includes improvements to approximately 43 miles of I-15 in Utah and Salt Lake Counties. The project's southern terminus is the South Payson I-15 interchange in the City of Payson; its northern terminus is the 12300 South I-15 interchange in the City of Draper. The City has the following comments with regard to the ***American Fork Main Street interchange***:

- a. The City is in favor of this interchange, as well as the I-15 Widening & Reconstruction alternative as it is an attempt to address future transportation and growth within the region.
- b. The City is in support of the East-West Connector and the 2009-2011 timeline for construction and completion of this important corridor. The City is also in support of the 2011 commencement for improvements to the I-15 Corridor, as this will allow for completion of the East-West Connector.
- c. The proposed East-West Connector is vital to the current and future transportation needs of Saratoga Springs. The American Fork Main Street interchange is the last piece to this important corridor.

Thank you for the opportunity to review and comment on the EIS for this important transportation corridor. The City anxiously anticipates the completion of these important roadways and the positive impacts they will have on the community and region. Please feel free to contact the City with questions on this letter, or for assistance on any other matter.

Sincerely,



Timothy L. Parker
Mayor, City of Saratoga Springs

Cc: Saratoga Springs City Council and Planning Commission
Saratoga Springs Development Review Committee



January 2, 2008

Mr. Carlos Machado
Federal Highway Administration, Utah Division
2520 West 4700 South, Suite 9A
Salt Lake City, UT 84118

RE: Draft Environmental Impact Statement (DEIS) for the I-15
Corridor Utah County to Salt Lake County

Dear Mr. Machado,

Payson City has received a copy of the subject study and appreciates the opportunity to review and comment on the document. After review of the document, we concur with the proposed I-15 widening through Payson City and the improvements to the South Payson Interchange Exit 248. However, we have serious concerns about the proposed improvements for the North Payson Interchange Exit 250.

As you are aware, most cities in Utah, and particularly cities the size of Payson, struggle to meet the financial demands required to maintain and operate the city. We rely heavily on the tax base that is generated from retail sales. Freeway interchanges are ideal locations for retail businesses because of visibility, accessibility to the traveling public, and the associated high traffic volumes. Because these interchanges are so valuable for retail businesses, the accessibility must be such that motorists will not be unduly delayed or burdened in accessing them.

Payson City feels that as proposed the improvements to the North Payson Interchange will significantly hamper the economic viability of the area because of the following reasons:

1. Impacts to existing businesses are very significant. There are four businesses that would be totally eliminated with this proposal; the Chevron Gas Station, Subway, Calvin Blohm Insurance Agency, and Payson Diesel. Four other businesses will have their existing access reduced or eliminated; Payson Market, McDonalds, Rite-Aid, and Comfort Inn. Access to the Flying J Fuel and Truck stop will be much more difficult to reach by truckers and most likely will result in closure of the business. Tax revenue provided to Payson City from these businesses last year was nearly \$82,000.

Payson City Corporation

499 West Utah Avenue, Payson, UT 84651 (801) 465-5200 Fax (801) 465-5208

2. With the freeway at ground level and Main Street elevated over the freeway, accessing businesses cannot occur until the motorists have traveled a considerable distance off the interchange, then down the elevated portion of Main Street both on the south and north sides of I-15. This greatly reduces the viability of the existing businesses as discussed in paragraph 1 but also limits future businesses from locating on the vacant parcels surrounding the interchange.
3. Payson City has planned and recently improved 600 North street as a major east/west collector for traffic. As proposed, the connection of Main street back into the original alignment is south of 600 north and will not facilitate using 600 North as a major collector street.

These concerns are not new and have been expressed to the DIES team as they have met with Payson City Development Staff on at least two different occasions. It is our request that additional design scenarios be created for review that will facilitate both traffic and economic development for the North Payson Interchange. We feel that the freeway interchange should be designed with the freeway elevated over Main street to facilitate accessibility to businesses.

We would hope that you would be mindful of our concerns and work to provide a solution that is acceptable to all parties involved. If you would like to discuss our concerns further, please contact Rich Nelson, City Manager at (801) 465-5207.

Sincerely,



Burtis Bills
Mayor



December 12, 2007

I-15 Corridor EIS c/o PB
488 East Winchester St, Suite 400
Murray, Utah 84107

RECEIVED
DEC 14 2007

Parsons Brinckerhoff
Utah Office

To whom it may concern,

Draper City appreciates the opportunity to review and comment on the draft Environmental Impact Study for the I-15 Corridor. After reviewing the study, Draper City has three items that we would like to see included in the I-15 Corridor EIS.

The Draper City Transportation Master Plan identifies a proposed minor arterial viaduct over I-15 at 13800 South. The area of Draper located south of Bangerter Highway and west of Interstate 15 is planned for commercial/retail development as well as a station for the Frontrunner Commuter Rail. These planned developments will generate significantly more traffic in this area and an alternate route will be of great significance. Currently, in the center third of Draper, there are only two routes between the east and west over Interstate 15; they are State Routes 71 and 154 (12300 South and Bangerter Highway). Localized traffic greatly impacts the operation of both of these routes and their interchanges at I-15. With a planned freeway to freeway connection between I-15 and SR-154, and an emphasis on maintaining freeway speeds and operation, a viaduct at 13800 South would improve the connectivity and operation of the roadways in the region while providing relief of congestion at the critical interchanges. The viaduct would also provide bicycle and pedestrian access across I-15 which currently does not exist in this area.

The study indicates that the improvements to I-15, between 14600 South and the Point of the Mountain, will include relocating the frontage road that is located to the east of the Interstate. Draper City requests that a cross-section of the proposed relocated frontage road, which accommodates wider travel lanes, bike lanes, and a multi-use trail, be included in the EIS.

There is a proposed multi-use trail crossing of I-15 which will connect the existing Porter Rockwell Trail in Draper with the Jordan River Parkway in Bluffdale. The proposed crossing will also serve as a connection of the Bonneville Shoreline Trail, on the east bench, to the Bonneville Shoreline Trail planned on the west bench. This trail link is also identified on the master plans of Bluffdale City and Salt Lake County. The study indicates that a Single Point Interchange is planned at 14600 South. Single Point Interchanges are not conducive to the inclusion of a multi-use trail crossing. Draper City requests that a separated safe trail crossing, in the vicinity of the 14600 South Interchange, be included in the I-15 Corridor EIS.

We appreciate your consideration of our recommendations and would be available for any further review and comment that you may need on this project.

Sincerely,

Mayor Darrell H. Smith
Draper City



153 North 100 East • P.O. Box 255 • Lehi, Utah 84043
768-7100 • Fax: 768-7101

SCANNED
DM 1-15-08

January 8, 2008

Carlos Machado, MBA
Federal Highway Administration
2520 West 4700 South, Suite 9A
Salt Lake City, Utah 84118

Dear Mr. Machado:

Upon review of the I-15 Draft Environmental Impact Statement ("DEIS"), the Mayor and Council of Lehi City would like to submit the following comments and recommendations for your consideration.

We recognize that with the reconstruction of I-15 there is an opportunity to improve access and mobility across the freeway at various locations in our community. While we are supportive of Alternative 4, we would like to make the following recommendations with respect to the following issues as they relate to future reconstruction and improvements of I-15 as anticipated in the I-15 DEIS Study. We believe they will add necessary attributes and improvements to Alternative 4 and must be included:

- We recommend a new underpass be constructed at 2300 West. This would allow 2300 West to continue north of I-15 and connect to 3200 North and eventually SR-92 and would facilitate north south movement in the area without channeling traffic through the SR-92 or 1200 West freeway interchanges. This proposed underpass is not shown on our current Lehi City Master Transportation Plan, but was an idea that was brought up in the January 2007 Transportation Summit that was held at MAG.
- The DEIS shows the construction of a new interchange in north Lehi, north of the existing SR-92 interchange. We support an interchange in this vicinity, but believe this new interchange would function best at 4800 North, with a separate underpass at the future Frank Ghery project site, because it would allow better spacing between the existing SR-92 interchange and the new interchange. Therefore, we recommend that a new underpass be added in conjunction with this new interchange.
- We recommend that the following existing I-15 crossings be widened/expanded as follows as per the current adopted Lehi City Master Transportation Plan:

- 600 East overpass needs to be widened to accommodate our master planned road size for 600 East of 40 feet of asphalt with 6 foot sidewalks.
 - 100 East underpass needs to be widened to accommodate our master planned road size for 100 East of 38 feet of asphalt and 62 foot overall ROW width.
 - 300 West underpass needs to be widened to accommodate our master planned road size for 300 West of 48 feet of asphalt and 70 foot overall ROW width.
- We recommend a new pedestrian underpass where I-15 crosses Dry Creek that would accommodate a 10 foot wide trail and the stream channel. The City has a Master Planned trail and linear park system along Dry Creek. An underpass would allow the trail to continue along the creek without major rerouting along surface streets to get across I-15 and would preserve a critical link for the linear park system from east to west across I-15. In order for the pedestrian underpass to be usable and safe, we recommend that the total width of the underpass structure, including the area for the trail and the stream channel, be at least 30 feet wide.
 - The Utah County trail master plan recommends a trail crossing of I-15 to connect the Murdock Canal Trail to the Jordan River Parkway somewhere north of SR-92 (final location has not been determined).
 - Lehi City and MAG are planning for a regional trail (Historic Southern Rail Trail) along the rail corridor owned by UTA. This 10 foot wide asphalt trail is currently being planned from the Lehi/American Fork boundary to the point of the mountain where it will continue north into Salt Lake County. A study is currently under way for the environmental and preliminary design of this trail. In order to accommodate this 10 foot wide trail, we recommend the existing I-15 underpass at US-89 be widened. This trail also needs to be considered with the widening of I-15 and reconstruction of the east frontage road at the point of the mountain to allow a safe trail corridor.
 - Despite the reference to the “planned” Mountain View Corridor on page 2-39, which is premature, the interchange located at 2100 North should be sized to accommodate traffic only from a primary arterial, per the Lehi City Transportation Master Plan.

It should be noted that most of the information above regarding under and overpass structures was included in memos sent by our City Staff to the I-15 EIS team on March 29, 2007 and again on October 31, 2007.

- With respect to the East-West Connector road in Lehi that will tie into I-15 at the American Fork Main Street interchange, we recommend that the width of the East West Connector be expanded to a six travel-lane section from I-15 to 300 East. There are several other arterial and collector class roads that will be feeding into the East-West connector between 300 East and I-15 including 700 South, 1900 South and 850 East. It is our opinion that these connecting roadways will generate a significant additional amount of traffic volume on the East-West Connector, and that a wider six travel-lane section through this area will be needed.

- The draft EIS shows three alternatives for the American Fork Main Street interchange. It is our opinion that if the environmental conditions that exist with option B are able to be resolved, it would be the best option (this option shows the East-West Connector Road extending straight east into American Fork on 200 South and connecting into a SPUI with the combined railroad overpass structure adjacent to the SPUI).
- The City has been working with UDOT on a possible location for the Mountain View Corridor to connect to I-15 at 4800 North. The City strongly supports this option, but there would need to be a separate underpass installed somewhere south of the 4800 North interchange as we have noted previously in our comments above. This new underpass would be needed to support local traffic between the Traverse Mountain & Frank Ghery projects and the west side of the freeway and also to provide for a trail connection from the Murdock Canal Trail to the Jordan River Parkway.

Thank you for allowing us an opportunity to comment on the draft I-15 EIS Study. We recognize the significance and need for the widening and other improvements that are planned for the I-15 corridor, and appreciate the efforts of the I-15 EIS team to move this project forward.

Sincerely,


Mayor Howard H. Johnson

cc: Merrell Jolley – Project Manager
UDOT Region Three Headquarters
658 North 1500 West
Orem, Utah 84057



CITY OF OREM
OFFICE OF THE MAYOR

January 10, 2008

Mr. Carlos Machado, MBA
Federal Highway Administration
2520 West 4700 South, Suite 9A
Salt Lake City, UT 84118

Mr. Merrell Jolley, PE
Utah Department of Transportation
658 North 1500 West
Orem, UT 84057

RE: I-15 Draft Environmental Impact Statement (DEIS) Comments

Dear Carlos and Merrell:

Orem City respectfully submits the following comments for the Utah Department of Transportation (UDOT) I-15 DEIS. Our City staff presented the following comments below to our City Council on January 8, 2008, with the session opened for public comment, and received unanimous approval by all Council members. Our City staff has prepared an additional detailed letter (attached) that explains our concerns below in greater detail.

1. Many of the I-15 over/under street crossings may not be wide enough to accommodate Orem City's desired future right-of-way widths as adopted by our City Council.
2. We would like to explore an overpass versus an underpass option with the proposed 1200 North roadway crossing.
3. We support full sound walls along the I-15 corridor AND the frontage roads.
4. We support Alternative 4, Option A (800 South Interchange and Frontage Road System). However, we would like a slip ramp to UVSC crossing under University Parkway connecting to the southern end of the campus drive.
5. The new 800 South Interchange alignment west of I-15 needs to be shifted further north in order to provide additional parking stalls for the proposed Intermodal Center.
6. We request that UDOT provide a relocated railroad crossing for access to the properties along 800 South between the railroad tracks and the west side of I-15 corridor. We would like the relocated crossing to connect at the northern portion of the proposed Intermodal Center site.

January 10, 2008
Mr. Carlos Machado, MBA &
Mr. Merrell Jolley, PE
Page 2

7. We have concerns about the skewed angle of the proposed 1200 West realignment at Center Street, the new residential street connections south of Center Street on 1200 West, and the alignment of Center Street west of I-15. We would like to explore a more southern alignment shift of Center Street west of I-15 so the northern properties, including but not limited to 231, 156 and 108, are less impacted by the reconstruction of the interchange.
8. We have concerns about the 2000 South connections with the proposed frontage road system being too close to the two existing at-grade railroad crossings west of I-15. We would like to explore grade separated railroad crossing options with UDOT.
9. We would like UDOT to reconsider the location of the frontage road access point on Sandhill Road by possibly moving it further to the north.
10. Please clarify the future 2030 traffic volumes for Alternative 1 (No-Build) and Alternative 4, Options A, B, C, and D that are presented in Chapter 2, Sections 2.4 and 2.5. It also appears that future 2030 traffic volumes for Sandhill Road are missing from the report. Please provide future 2030 Alternative 1 (No-Build) and Alternative 4, Options A, B, C and D traffic volumes for Sandhill Road from 1740 North to University Parkway.

Please accept these comments into your I-15 DEIS. Orem City appreciates the opportunity to provide input towards this I-15 reconstruction project. We fully understand that this project is a huge undertaking for all agencies involved and the benefits of reconstructing I-15 will be of great significance for Orem City residents.

Sincerely,



Jerry C. Washburn
Mayor

December 13, 2007



Lewis K. Billings
Mayor

Mr. Merrill Jolley, I-15 Corridor EIS Project Manager
UDOT Region Three
658 North 1500 West
Orem, Utah 84057

Mr. Ron Clegg, Project Manager
Parsons Brinkerhoff
488 East Winchester, #400
Murray, Utah 84107

Re: Comments from the Provo City Administration and Municipal Council
regarding proposed Widening of I-15 through Provo City Limits.

Gentlemen:

During the last several months, Provo City has taken the opportunity to carefully review the alternatives proposed for improving capacity and function of I-15 through Utah County and more specifically through the boundaries of our City. In our estimation, the Project Design Team has done an excellent job in coordinating not only the state-wide needs and issues, but also the needs of the various local jurisdictions along the affected corridor.

The website provided by project planners was especially useful and helpful as we sought to understand and evaluate the various proposals. The time project planners were willing to spend with us in responding to our questions and issues was also most helpful and appreciated.

I-15 has been a significant transportation corridor and benefit to all of the cities in Utah County for the past 50 years, but has also created a significant barrier for transportation access to both sides of those cities divided when it was constructed. In order to provide for City traffic circulation in the future and to accommodate the continuing increases in traffic volumes and congestion, the following items are a necessity for the plan to be successful:

FRONTAGE ROAD SYSTEM - We feel that the frontage road concept is extremely important in aiding and expediting traffic, not only onto the Interstate north and south, but to help facilitate east and west traffic movement in the City. With the connection of our collector and arterial roads to the frontage road system,

351 West Center Street

P.O. Box 1849

Provo, Utah 84603

(801) 852-6100

FAX: (801) 852-6107

www.provo.org



we will be provided with quicker and more efficient access to underpasses along the freeway. We feel the frontage road system will provide more immediate access to many residential neighborhoods along its frontage with our boundaries and eliminate much of the cross traffic that is currently traversing our cities north and south to a very limited number of interchanges. It will also eliminate traffic that uses the I-15 corridor now as a collector, thus congesting the main line. This will aid in dispersing our traffic to the Interstate without unduly concentrating it in sensitive areas. We strongly urge the adoption of the "Frontage Road System." We would have preferred the Frontage Road System to continue through the University Avenue Interchange, but we recognize the significant expense that would involve through encroachment into adjacent developments along this section. The 500 West Underpass will help alleviate some of this need which will be addressed later in this review.

CENTER STREET INTERCHANGE - We feel that a Single Point Urban Interchange will be necessary for an efficient transfer of transportation between I-15 and our City road network. The current design for the Single Point Urban Interchange as shown on the plans will not accomplish this goal. The SPUI as shown has three signalized intersections which will be very difficult to coordinate and cause additional future unneeded congestion. We would like to see the frontage road concept taken through the interchange with either braided ramps or some other means in order to eliminate two of the signalized intersections. We have noted the comment on Option B that indicates further design will need to be done on this interchange and we support this effort.

CENTER STREET VIADUCT REPLACEMENT - As shown on all of the interchange drawings, the Center Street Viaduct will be replaced and significantly widened. This viaduct needs to be replaced as shown. Our opinion is that this facility should be increased to a seven lane design in order to accommodate the east-west flow that currently exists today and to meet future growth on the west side including the airport.

500 WEST UNDERPASS - The 500 West Underpass is needed to accommodate our restricted east-west flow. When I-15 is widened it is likely that the existing frontage road, on the west side, will be narrowed or eliminated. 500 West must connect both sides that have been separated since the original construction of I-15 in the 1960's. We fully support this concept and commend the I-15 Team for their consideration.

UNIVERSITY AVENUE INTERCHANGE (WESTERN LEG) - As the I-15 Design Team is aware, Provo City's and MAG's long-range plan include a highway from the University Avenue Interchange to the Provo City Airport. This highway will intercept five or six collector and arterial roads on our west side. We recognize that the environmental issues are being addressed in a separate Environmental Impact Statement for the Westside Connector, but emphasize that when this study is completed and assuming the preferred option could be a connection to the University Avenue Interchange, Provo would like this connection included in your plans as final design and funding are arranged for I-15.

REALIGNMENT OF 820 NORTH INTERSECTING GENEVA ROAD - In order to provide Frontage Road access with reasonable grades over the railroad north of 820 North it was determined by the Design Team that the 820 North connection needs to be relocated with an 'S' Bend connecting to 620 North at Geneva Road rather than the current 820 North at Geneva Road. The 820 North Underpass will be eliminated. The 820 North alignment at Geneva Road is undesirable for an intersection and we commend the Design Team for their approach since the west leg of that intersection goes directly into a residential local road. In addition to providing frontage road access and reasonable grades over the railroad, this also connects two important arterial roads on our Master Plan for much better traffic circulation. Provo City supports this concept and would like to see it continue through the final development of the project.

IN SUMMARY - As we have evaluated the four options that have been presented to this point in the Draft Environmental Impact Statement, Provo City's preference is Option B which includes the "Frontage Road," the Center Street Viaduct replacement and widening, the SPUI at Center Street and I-15, the 500 West Underpass under I-15, and the relocation of 820 North Geneva Road Intersection to 620 North with the following exceptions. The Single Point Urban Interchange that is currently conceptual only, needs to be redesigned to accommodate a single signalized intersection without the signalized intersections as shown where the frontage roads join. A notation on the drawings that indicates at University Avenue Interchange, a west leg to the Airport is currently being studied and if a viable and acceptable environmental alternative is chosen, it will be included in the I-15 plan during final design and construction. Also we feel that the Center Street Viaduct in its current five-lane concept will be inadequate for our future needs and recommend that a seven-lane alternative be adopted.

UDOT I-15 Corridor EIS
December 13, 2007
Page Four

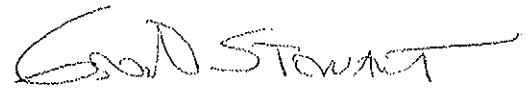
We commend the I-15 Design Team for their immense efforts in putting together a very comprehensive study of the needs and impact to the Utah County area and Provo City specifically. We have appreciated your willingness to include our needs and interconnections through this process. We look forward to an efficient and well designed I-15 Corridor through our County, recognizing this as the most important corridor in our region.

Sincerely yours,

PROVO CITY CORPORATION



Lewis K. Billings
Mayor



George O. Stewart
Municipal Council Chair



AMERICAN FORK CITY

PUBLIC WORKS DEPARTMENT

ENGINEERING DIVISION

MEMORANDUM

DATE: January 8, 2008
FROM: American Fork City Public Works and Engineering Division
TO: Merrill Jolley, P.E. Utah Department of Transportation
Cc: Mayor Heber Thompson

SUBJECT: WEST MAIN STREET INTERCHANGE

RECEIVED
1-10-08
H. Jolley

Recently, in conjunction with the I-15 reconstruction Environmental Impact Statement, the City of American Fork contracted with Hales Engineering to provide a traffic study and recommendations for the West Main Street Interchange. In the process of that review, Hales Engineering identified the forecasted traffic for the interchange within the 20-year design window of 45,000 vehicles per day as per information provided by Parsons Brinkerhoff (PB). The City acknowledges that the Interstate and Interchange system fall under the purview of the Utah Department of Transportation; however, as the interchange will greatly effect the function of the adjacent City streets within the blossoming commercial areas. The City is concerned that the traffic congestion on the interchange not cause the intersections on the adjacent City streets to lapse into failure. As such, below are a few points that we would like to discuss further with UDOT relative to the interchange as the designs continue to progress.

- Adequate lane configuration crossing the interchange: It appears from the concept drawings in the EIS that there are only two through lanes in each direction across the interchange. It is our understanding from our traffic consultants that to pass 45,000 vehicles per day at a Level of Service 'D' a configuration with three through lanes in each direction will be required. Previously the City's understanding has been that the section would include 7 travel lanes.
- Adequate turning pockets and ramp metering queues: We recognize that this level of examination may not have been completed at this point; however, we would like to ensure that the anticipated peak hour queues in the interchange traffic do not extend into the adjacent City intersections.
- Vineyard Connector: It is our understanding that the Vineyard Connector traffic is not included in the 45,000 VPD that has been modeled for the I-15 project. We understand

the current projected volumes of the Vineyard Connector to be 30,000 ~ 40,000 VPD. We have some concern in regards to the effect of this additional traffic burden on the level of service of the interchange.

- Signalization of the adjacent City streets and the Front Runner access road: We would like to discuss the anticipated signalization of the adjacent City streets and other UDOT access management restrictions in the area to allow us to adequately plan the City facilities and to correctly direct development in the area.
- ITS Interconnect: We assume that the new signals will be incorporated into the existing UDOT sponsored signal interconnect system that is in place within the City.

We recognize the immense effort that a reconstruction plan with the magnitude of I-15 represents and praise UDOT's efforts in keeping the communities involved in the decision making process. Thank you for all your help and co-operation with the City. We look forward to continue working together toward successful transportation solutions. Please contact us if you have any questions about our comments.

*City of
American Fork*

*Incorporated
June 4, 1853
State of Utah*

Mayor:

HEBER M. THOMPSON

City Council:

SHERRY KRAMER
DALE O. GUNTHER
SHIRL DON LEBARON
HEIDI K. RODEBACK
RICK STORRS

City Staff:

MELANIE MARSH, MPA
Chief of Staff
CATHY JENSEN, CPA
Finance/Budget Officer
RICHARD M. COLBORN, CMC
City Recorder
PAMELA D. HUNSAKER, CMFA
City Treasurer
LANCE M. CALL
Chief of Police
HOWARD DENNEY, PE
Public Works Director
TUCKER HANSEN
City Criminal Attorney
KASEY WRIGHT
City Civil Attorney
ROD DESPAIN
City Planner
JAY CHRISTENSEN
Fire Chief
ANDREW SPENCER, P.E.
City Engineer

January 10, 2008

Merrill Jolley
Utah Department of Transportation
658 North 1500 West
Orem, UT 84058

Dear Mr. Jolley:

Enclosed is the Resolution adopted by the American Fork City Council on Tuesday, January 8, 2008, regarding their preference with regard to the West Main I-15 Interchange.

Thank you.

Sincerely,



Richard M. Colborn
City Recorder

51 East Main
American Fork, UT 84003

801-763-3000 Phone
801-763-3004 Fax
www.afcity.org

RESOLUTION NO. 08-01-03R

A RESOLUTION RELATING TO THE PLANNING AND DEVELOPMENT OF THE PROPOSED RECONSTRUCTION OF U. S. INTERSTATE HIGHWAY 15 INCLUDING THE PROPOSED RECONSTRUCTION THE WEST AMERICAN FORK INTERCHANGE AND WESTWARD EXTENSION OF MAIN STREET TO THE CITY BOUNDARY, THE RECONSTRUCTION OF THE 500 EAST INTERCHANGE, AND CERTAIN OTHER IMPROVEMENTS TO INTERSTATE HIGHWAY 15 WITHIN THE CITY BOUNDARY.

WHEREAS, the Utah Department of Transportation (UDOT) and Mountainland Association of Governments (MAG) have heretofore identified the need for the reconstruction of U. S. Interstate Highway 15 (I-15) to better accommodate the existing and future volume of traffic using said highway; and

WHEREAS, as part of the plans for reconstruction, UDOT, MAG and their consultants have heretofore identified the need for reconstruction of the interchange at West Main and 500 East and other improvements along the portion of I-15 within the boundaries of American Fork City; and

WHEREAS, the American Fork City Council has heretofore adopted Resolution 07-01-02R stating the City's support for the reconstruction of the West American Fork Interchange, provided the alignment of the extension of Main Street westward from the interchange continued along the north side of the of the existing railroad right-of-way (the Diamond Option - Option A); and

WHEREAS, UDOT has now prepared a plan for the West American Fork Interchange showing a third option (Option C) which Option proposes a Single Point Urban Interchange (SPUI), but retains the alignment of the West Main Street Extension along the north side of the railroad right-of-way; and

WHEREAS, American Fork City, with the aid and recommendations of City Transportation Committee, Planning Commission, City staff and its traffic consultant, Hales Engineering, has evaluated Option C and determined that Option C addresses the concerns and objectives of American Fork City in a manner equal to or better than Option A; and

WHEREAS, UDOT has prepared an Environmental Impact Statement (EIS) which addresses the proposed West American Fork Interchange and other improvements relating to I-15 within American Fork City and has requested comments regarding the various elements of the

plan(s) for reconstruction.

NOW THEREFORE, THE AMERICAN FORK CITY COUNCIL RESOLVES AS FOLLOWS:

SECTION 1. West American Fork Interchange - American Fork City hereby acknowledges the need for the reconstruction of the West American Fork Interchange to better serve the community, particularly the area located west of I-15, City and has determined that Option C (Modified SPUI) is the most appropriate alternative (Attachment 1). Provided, However, that this statement of support specifically applies only to the interchange and the westward extension of Main Street and **specifically excludes and should not be construed as support for the proposed connection of the Vineyard Connector in the location shown on the draft plan.**

SECTION 2. East American Fork Interchange - American Fork City hereby acknowledges the need for reconstruction of the 500 East Interchange and does hereby express its support of the plan for reconstruction as indicated in the EIS.

SECTION 3. Up-grade of existing underpass structures at 100 East And 300 West - American Fork City hereby acknowledges the need for reconstruction of the existing 100 East underpass as shown in the EIS and the realignment and reconstruction of the 300 West underpass as shown on the EIS and does hereby express its support of the plan for reconstruction in harmony with the City's General Plan and cross-section standards.

SECTION 4. Additional Underpass Structure - The American Fork General Plan has identified the need for and additional underpass structure to accommodate future the north-south traffic demands that will result from new development in the area located south of the I-15 right-of-way. Accordingly, the plans for reconstruction of I-15 should provide for an additional underpass structure at to be located at 100 West Street or Center Street as recommended by the City's General Plan (Attachment 2).

SECTION 5. Interconnection with other Major Traffic Routes - The City Council hereby acknowledges the need for an additional east-west traffic route to better serve the area located west of American Fork City, and affirms its support for the reconstruction of the further extension of the West Main Street and connection into the Lehi 10th South Arterial, provided the plans include inter-connecting routes with the proposed Southern Arterial (1500 South /1900 South) and East Lehi Interchange to encourage dispersal of through traffic.

SECTION 6. Existing Park and Ride Facility - Reconstruction of the West American Fork Interchange will disrupt the function of the existing park and ride facility. This facility currently operates at or above capacity on normal working days. All further planning for reconstruction of I-15 and the West American Fork Interchange should include the continuation

of an adequate park and ride facility.

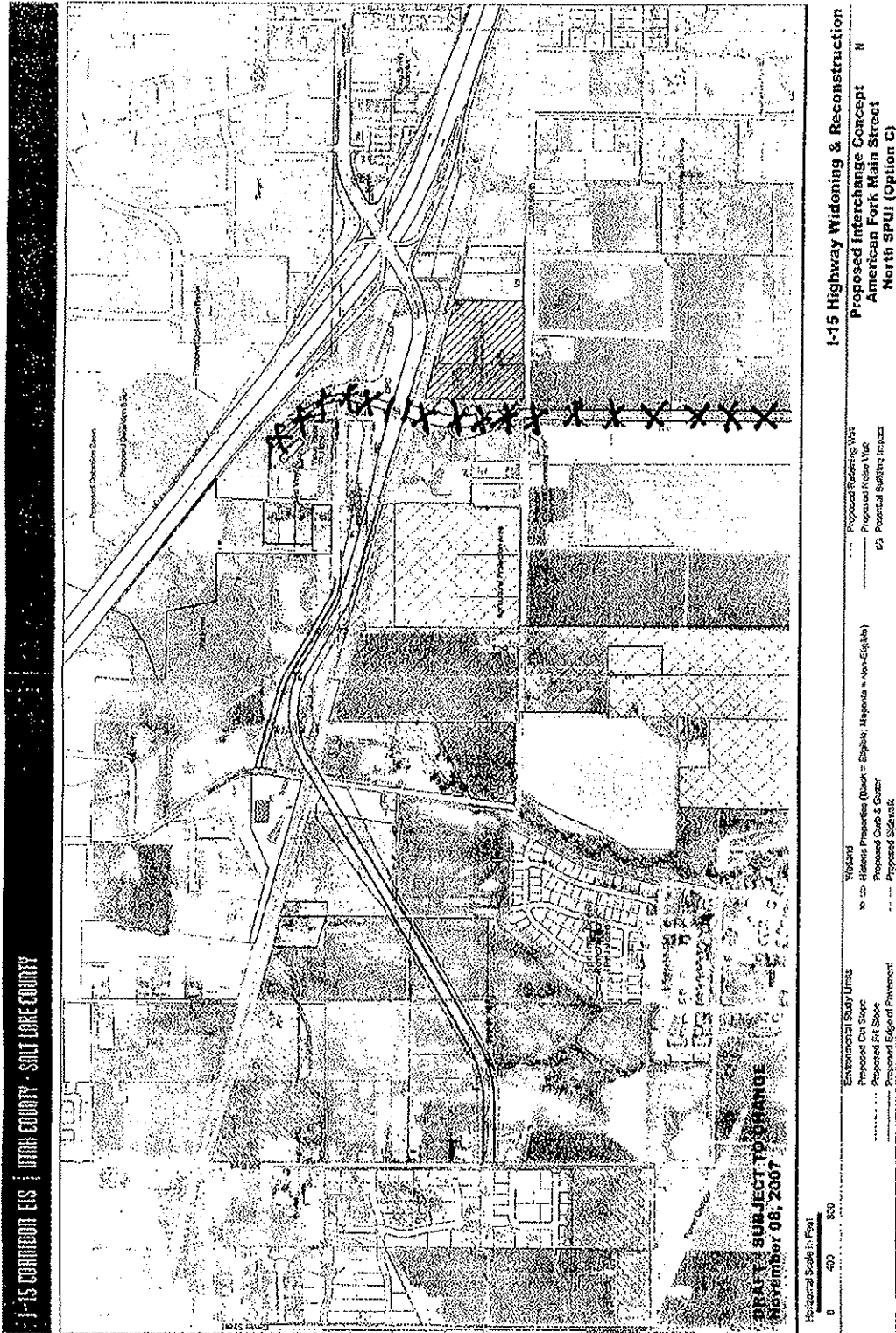
SECTION 7. Authorization to Support City Position -The City Council does hereby authorize its members and City staff to represent the policy and positions expressed in this Resolution as the "position of the City" on the matter in all meetings and communication regarding the subject, and does hereby instruct the staff to work with UDOT, MAG, adjacent communities and agencies having responsibility for planning and development of the I-5 Corridor, 10th South Lehi Arterial, and Vineyard Connector in the implementation of the traffic facilities identified herein and to take such other actions as would tend to support development of the City's preferred alternatives.

Enacted by the City Council of American Fork City this 8 Day of January, 2008.

Walter M. Thompson
Mayor

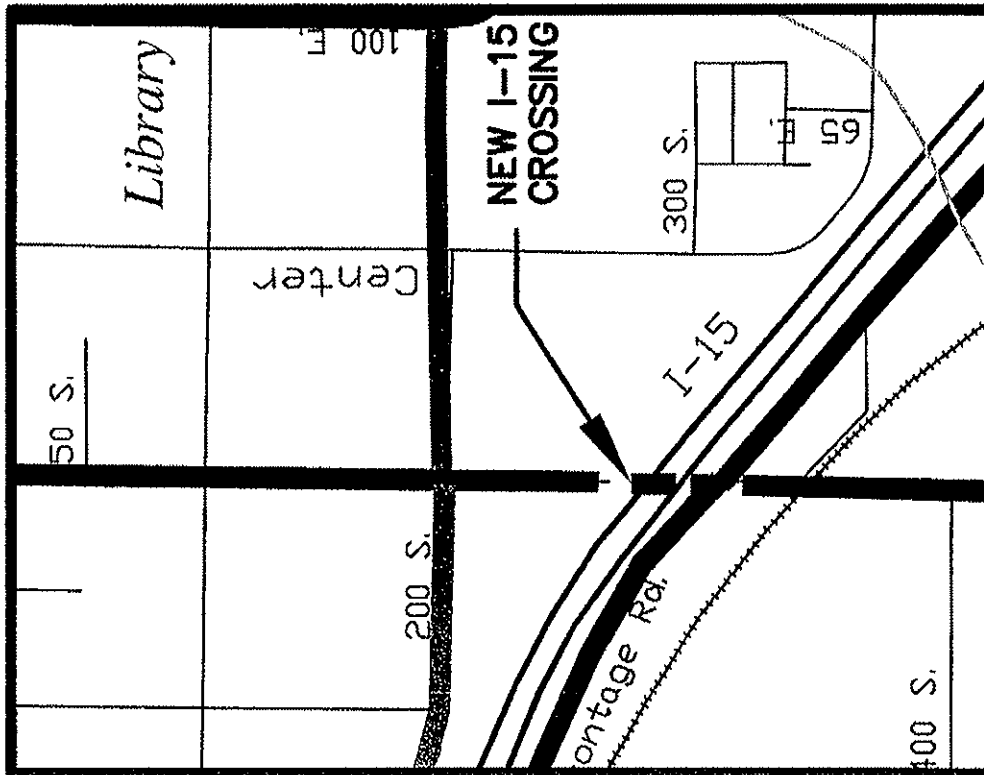
ATTEST:
Veronica Lurker
City Recorder
Deputy Recorder





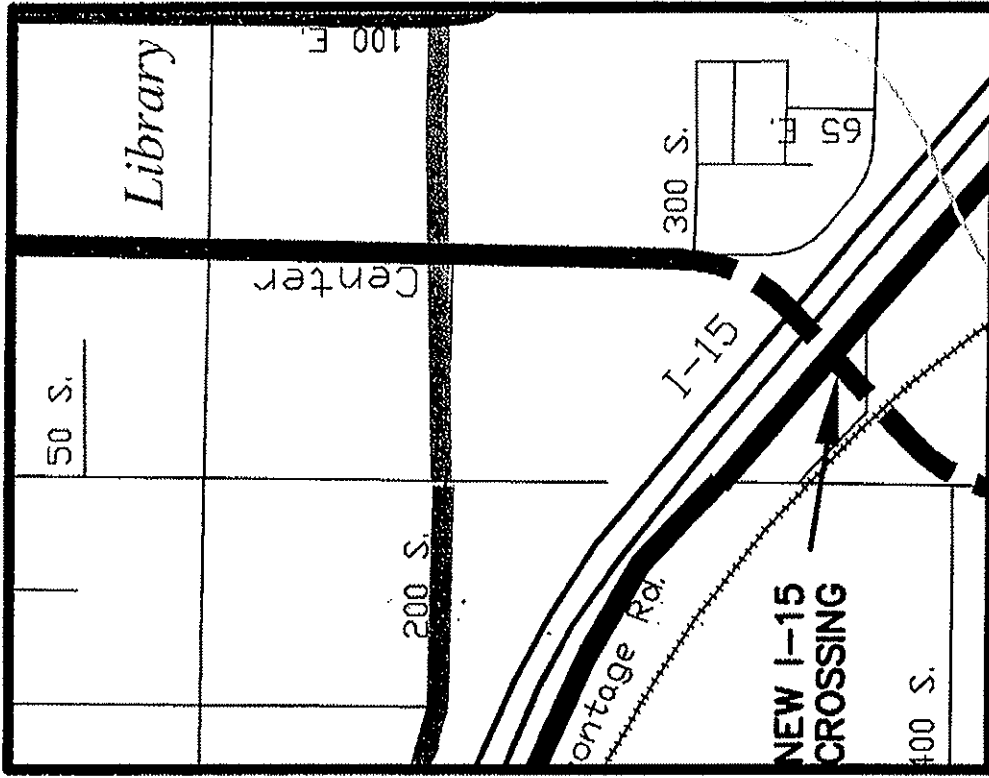
ATTACHMENT 1

DETAIL A



OR

DETAIL B



100 WEST OPTION

CENTER STREET OPTION

ATTACHMENT 2

Murray, Pam

From: ANDREW JACKSON [AJACKSON@mountainland.org]
Sent: Tuesday, December 18, 2007 3:01 PM
To: Merrell Jolley
Subject: MPO Comments on I-15

Merrell

The following is a draft of the MPO comments. Let me know if you have concerns

Andrew

I-15 Corridor EIS c/o PB
488 E. Winchester St., Suite 400
Murray, Utah 84107

January 3rd, 2008

RE: Mountainland Metropolitan Planning Organization Official Comment on the I-15 Corridor

To Whom it may concern:

Please accept this letter as the Mountainland Metropolitan Planning Organization's (MMPO) official comment on the I-15 Corridor Draft Environmental Impact Statement.

We feel it is important to assure that the final alignment meets in the Purpose and Need of the study. The reconstruction of I-15 is consistent with the Mountainland Metropolitan Planning Organization's Regional Transportation Plan (RTP)

The MMPO supports Provo City's request to have a Single-Point Urban Interchange built at Center Street and I-15.

The MMPO also requests a design for the Orem 800 South interchange that reduces the impact on developable land near the inter-modal center on the west side of I-15.

Additionally, the MMPO encourages full cooperation with American Fork City in the design of the Main Street interchange to ensure compatibility with the City's General Plan.

As always, the MMPO will support the final alignment as identified by the Federal Highway Administration in the Final Environmental Impact Statement and will amend our RTP if need.

Thank you for the opportunity to comment.

Sincerely,

Mayor Jerry Washburn, Chair
Regional Planning Committee
Mountainland Metropolitan Planning Organization



WASATCH FRONT REGIONAL COUNCIL

295 North Jimmy Doolittle Road • Salt Lake City, Utah 84116 • www.wfrc.org
Phone Salt Lake: 801.363.4250 • Fax: 801.363.4230 • Phone Ogden: 801.773.5559

January 11, 2008

John Pétroff, Jr.
Chairman
Mayor, West Point

Michael H. Jensen
Vice-Chairman
Councilman, Salt Lake County

Byron Anderson
Mayor, Grantsville

Ken Bischoff
Commissioner, Weber County

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Carlton Christensen
Councilman, Salt Lake City

Peter Corroon
Mayor, Salt Lake County

J. Lynn Crane
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Craig L. Dearden
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Tom Dolan
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Matthew R. Godfrey
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Dennis Nordfelt
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Ronald G. Russell
Mayor, Centerville

Bruce Sanders
Councilman, Morgan County

JoAnn B. Seghini
Mayor, Midvale

Louenda Downs
Utah Association of Counties

George Garwood
Utah League of Cities & Towns

Robert Grow
Envision Utah

Mr. Carlos Machado, MBA
Federal Highway Administration
2520 West 4700 South, Suite 9A
Salt Lake City, Utah 84118

RE: I-15 Corridor Utah County to Salt Lake County Draft Environmental Impact Statement and Section 4(f) Evaluation, November 2007

Dear Mr. Machado:

We received the I-15 Corridor Utah County to Salt Lake County Draft Environmental Impact Statement and Section 4(f) Evaluation and appreciate the opportunity to make comments. This project is included in the Wasatch Front Regional Transportation Plan: 2007-2030, which was adopted in May 2007.

After reviewing the document, we have several comments:

1. Section 1.5.2.3 Wasatch Front Regional Transportation Plan: 2007-2030, should include "Provide commuter rail service between Salt Lake and Utah Counties parallel to I-15" as this project is in both of the MPO's Regional Plans.
2. In general, there are three issues related to air quality in Section 3.8 that deserve a second review before a final EIS is prepared.
 - a. The 1-hour ozone standard was revoked in June of 2005. Salt Lake County was formerly a non-attainment area under the 1-hour ozone standard. Salt Lake and Utah Counties have always been in attainment of the current 8-hour ozone standard. A revision to the 8-hour standard has been proposed but it is not yet in place and there is still some uncertainty what the standard will be. It is appropriate to address ozone in the EIS since it will still be an issue for air quality, but the discussion should be in the context of the proposed standard revision not the old 1-hour standard that no longer applies or the current 8-hour standard which is being attained. Table 3.8-2 should be revised to show that Salt Lake County is an attainment area for the current ozone standard.
 - b. A new standard for PM_{2.5} is in effect and this should be addressed in all sections of the air quality discussion along with the various other criteria pollutants that are addressed. EPA final designations have yet to be made but

all indications are that the Wasatch Front counties will be non-attainment for $PM_{2.5}$ at the new $35 \mu g/m^3$ standard. Where $PM_{2.5}$ is addressed it would be helpful to give these sections a separate heading or section number as appropriate rather than combining $PM_{2.5}$ with the PM_{10} discussion. This will assist reviewers who might otherwise mistakenly conclude that $PM_{2.5}$ was not addressed.

- c. The most recent WFRM conformity analysis was prepared in 2007 and is available on the website. There are a number of citations to WFRM's 2006 conformity analysis. The EIS should reflect the more recent date and the latest data from the 2007 analysis.

Again thank you for the opportunity to comment on this project. We look forward to future coordination with you, the publication of the Final Environmental document and construction of the project.

Sincerely,



Doug Hattery
Deputy Director

FACSIMILE TRANSMITTAL SHEET

To:

PSAFEDS

From:

680 South Orem Neighborhood

FAX NUMBER:

(801) 262-4303

Date:

January 10, 2008

COMPANY:

I-15 EIS Team

TOTAL NO. OF PAGES INCLUDING COVER:

4

Subject

I-15 DEIS Comments

☐ URGENT ☐ FOR REVIEW ☐ PLEASE COMMENT ☐ PLEASE REPLY ☒ PLEASE PROCESS

NOTES/COMMENTS:

I-15 DEIS Team:

Attached is a letter from the 680 South Orem Neighborhood regarding the DEIS 1-15. The original letter is coming by regular mail.

If you need to contact us please send an email to rocarruncho@msn.com

Thank you.

Carlos Machado
Federal Highway Administration
2520 West 4700 South, Suite 9A
Salt Lake City, Utah 84118

Dear Mr. Machado:

Thank you for the opportunity to review and comment on the Draft Environmental Impact Statement (DEIS), I-15 Corridor Utah County to Salt Lake County, (FHWA-UT-EIS-07-01-D); Project No. IM.NH-15-6(149) 245E.

Our neighborhood is located at 680 South in Orem adjacent to I-15. We would be impacted by the design options A and C which propose to realign 800 South in Orem from its present location to a new location directly adjacent to homes along 680 South. We have reviewed the pertinent sections of the DEIS that directly effect our neighborhood and offer the following comments under the authority of the National Environmental Policy ACT (NEPA).

Although there are direct impacts to our neighborhood the DEIS fails to include the 680 South homes within the study area. We believe this is an oversight and should be corrected. The following are examples of inconsistencies caused by this oversight.

- Section 3.2.3 of the DEIS states the construction of a new interchange at Orem 800 South would have positive impacts on existing social networks and community cohesion. This statement cannot apply to the 680 South neighborhood since the area was not included in the area of study.
- Section 3.3 of the DEIS deals with Environmental Justice and Executive Order 12898. However, the DEIS fails to include the neighborhood of 680 South within the study limits making it impossible to determine if the Executive Order has been met.
- Although section 3.3.4.4 suggests there would be no difference between the level of impacts of the design options, the failure to include the 680 South neighborhood invalidates this statement.

We request information be provided on discussions between the Utah Department of Transportation (UDOT) and Utah Valley State College and UDOT and Orem City regarding the proposed realignment of 800 South in Orem from its present location.

We request that specific evaluations or studies be conducted in the 680 South neighborhood on Noise, Visual, Safety, Minority, Economic, and Socioeconomic

resources to determine potential impacts caused by the realignment of 800 South from its present location. These studies must be included in the Final EIS.

We request that any impacts to the 680 South neighborhood be identified in the Final EIS and commitments for full mitigation of those impacts be made in the Final EIS and Record of Decision.

Again, we appreciate the opportunity to comment and have our concerns fairly considered.

Sincerely,

The 680 South Neighborhood

Name	Address	Signature
Vaughn Clegg	962 W 680 S	Vaughn Clegg
Reed R. Murray	960 W. 680 S.	Reed R. Murray
Donna Mills	977 W 680 S.	Donna Mills
DENNIS LARSON	980 W. 680 S.	Dennis Larson
Ramon B. Zabriskie	1008 W 680 S.	Ramon B. Zabriskie
KERRY MURRAY	960 W 680 S	Kerry Murray
Jeanette R. Parker	686 S 1000 W	Jeanette R. Parker
Elayne McArthur	1006 W. 680 S	Elayne McArthur
Claudia Mann	992 W 680 S	Claudia Mann

Name	Address	Signature
Kew Robinson	1093 W. 680 South	Kew Robinson
Muriel Robinson	1093 W. 680 South	Muriel Robinson
RICHARD BEST	662 W 1160 S	R. Best
Angela Gillespie	1059 S. 1160 W	Angela Gillespie
Mark A. Gillespie	659 S. 1160 W.	Mark A. Gillespie
JAMES S. MOORE	1146 W. 680 S.	James S. Moore
Robert M. Graves	1105 W. 680 S.	Robert M. Graves
Carla H. Whitney	1276 So 1115 W	Carla H. Whitney
Joe L. Whitney	676 So. 1115 W	Joe L. Whitney
Billy Rife Heaton	662 So. 1115 W.	Billy Rife Heaton
Beth Feltton	662 S. 1115 W.	Beth Feltton
BRADFORD THOMPSON	1081 W. 680 S	Bradford Thompson
Randel Heaton	1069 W 680 So	Randel Heaton
Sue Heaton	1069 W. 680 S.	Sue Heaton
Dennis Winger	1076 W 680 S.	Dennis Winger
EILEEN WINGER	1076 W. 680 S.	Eileen Winger
AMBER MYERS	1036 W 680 S	Amber Myers
TOP MYERS	1036 W 680 S	Top R. Myers
Deniere Hawkins	683 S. 1040 W	Deniere Hawkins

*Received
Jan 11 2008*

To Whom It May Concern,

This letter represents the collective viewpoint of 12 property owners between I-15 and Geneva Road along the south side of 800 South and east side of Geneva Road in Orem. It is our request that the west-bound 800 South/I-15 interchange road be redirected from its currently designated location toward the north so that it would run parallel to 800 South directly over the homes currently situated on the south side of 800 South. The homes mentioned, and thus impacted, are owned by the combined authors of this letter.

We consolidate the emotion we feel in recommending such a proposal into the following economically-viable, politically-expedient and fair-minded points. To understand these points, one must begin with the acknowledgement that there are a multitude of interests impacted by any placement of this road. These interests at least include the citizen homeowners drafting this letter, the City of Orem, Utah Valley State College, the Utah Transit Authority, and the Utah Department of Transportation. With such varied interests, could it be possible to propose a solution that would satisfy each of the parties involved? This is both the intent and, we believe, the result of our proposal.

By moving the road to the north, a contiguous tract of development land would be left to the south. This large parcel of property borders property owned and operated by Utah Valley State College. The parcel also borders property currently being sought by the Utah Transit Authority for the development of an intermodal hub for its upcoming rapid transit line to Salt Lake City. The City of Orem wants both the I-15/800 South Interchange and the UTA Intermodal Hub for its citizens and for the welfare of the City. The City also wants the transition of Utah Valley State College into Utah Valley University to be supported by its economic development policies. This large contiguous parcel would allow for transit-oriented development that would support additional UVSC student housing, create UTA Intermodal Hub proximity (thus increasing its traffic and use), and fulfill the intent of the Orem City Council which, in June of 2007, passed a resolution calling for transit-oriented development on this very parcel of land. Subdividing this contiguous parcel of land, as the road currently proposed would do, would destroy a large portion of its otherwise beneficial use. The remainder of property to the south of the proposed road would be insufficient for the type of development described above. The parcel to the north would also be too small to support viable commercial development and would strand some of the current residents within feet of a five-lane interchange road. Moreover, the current road placement would intersect with Geneva Road, a 50 MPH road, in dangerously close proximity to the current 1000 South traffic semaphore. Were the new interchange road to pour onto Geneva Road at roughly 800 South, there would be nearly double the distance for traffic to navigate its way through these two intersections. Considering the variety of interests impacted by this decision, we believe that our proposal preserves the interests of all parties and is thus the most politically-expedient alternative remaining.

From our meetings over the past months with all parties previously mentioned, we believe that all can see and accept the benefits associated with our proposed road placement. The two major impediments to our proposal would be cost and the impact on potentially historic properties.

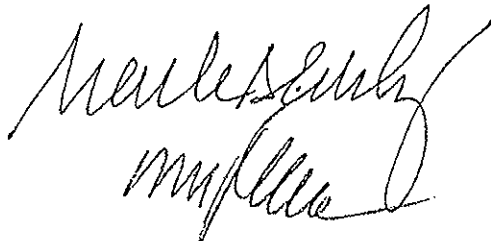
With respect to cost, an appraisal of the property bordering our land, which is currently owned by UVSC and being sought for purchase by UTA, estimated the "as-is" value of this R-12 zoned parcel at \$350,000 per acre. Our property is identically zoned and touches the appraised parcel. We believe it safe to assume, as a result, that the value of our raw R-12 land is approximately \$350,000 an acre. To purchase the land necessary to run the road where it is currently designated, in addition to the purchase of the land and home where the road exits onto Geneva Road, would be more expensive than it would be to purchase all of the homes on the south side of 800 South. These homes were recently appraised along with the immediately surrounding 1/4 acre of ground (roughly the width of the road) at an average of \$230,333. The remaining 3/4 acre of raw R-12 land behind nearly every home on 800 South would remain untouched by our proposed road location. In fact, we just signed a contract including non-refundable earnest money with a commercial developer willing to pay \$600,000 per acre for our land. We believe that upon further analysis of the acquisition cost associated with our proposal, that UDOT would find it more economically-viable to reposition the road to the north.

As for the impact of our proposed road on potentially historic homes, we are currently in negotiations with the City of Orem to purchase and raze these homes. In fact, this past week the City of Orem independently hired an appraiser to assess the value of the potentially historic properties along 800 South. We have entered into good faith discussions with Mayor Washburn, City Manager Jim Ream and City Attorney Steve Earl for the purchase of these properties. Were the City of Orem to decide not to purchase the homes, we have expressed and again express our intent to remove the homes.

In the end, we are left with a proposal that satisfies the needs of each competing interest holder which is both politically-expedient and economically-feasible. The remaining argument, although perhaps less legally relevant and persuasive, is an appeal to our shared sense of fair-mindedness. Many of the homeowners living along 800 South built these homes themselves. They are their original occupants. They have raised families, planted deep roots and intended to live, retire and die in these homes. The negative impact on these families, to say nothing of the impact to the value of their homes, caused by the currently proposed road placement would be acceptable only if every other alternative had been exhaustively explored. There is no other reason to cause some of these families to lose their homes and the remainder to live within such proximity of a five-lane highway interchange road.

Gladly, there is an alternative; not only an alternative, but a clearly better alternative. We respectfully submit that our proposal is not merely the right thing to do, but that it also satisfies UDOT's duty to wisely spend taxpayer funds and its duty to develop and maintain its goodwill with municipal and state entities. For the foregoing reasons, we sincerely hope that the road will be realigned to our proposed location.

Hai J Allen and Mark D. Eddy on behalf of all the residents along 800 South.

The block contains two handwritten signatures in dark ink. The top signature is 'Hai J Allen' and the bottom signature is 'Mark D. Eddy'. Both are written in a cursive, flowing style.

Mendez/Schoenfeld	849 South Geneva Road
Gary L. Morrill	1495 West 800 South
Todd & Shaun Haderlie	1485 West 800 South
Haderlie rental home	1467 West 800 South
Robert Stephenson	1451 West 800 South
Mark D. Eddy	1435 West 800 South
Hal J. Allen	1421 West 800 South
Troy Whiting	1405 West 800 South
HB Amett	1391 West 800 South
Sheldon Frandsen	1375 west 800 South
Richard and Wade Opfar	1357 West 800 South
Michael and Carol Harper	1341 West 800 South

January 9, 2008

Utah Department of Transportation
I-15 Corridor EIS c/o PB
488 E. Winchester St., Suite 400
Murray, Utah 84107

RECEIVED
JAN 10 2008

Parsons Brinckerhoff
Utah Office

We, residents of Deerfield Subdivision in Orem, Utah, are writing regarding the 1200 West Realignment at Orem Center Street due to the I-15 Corridor project. We hereby formally petition and request that the proposed neighborhood access road onto 85 South NOT be constructed and that 40 South be closed off and dead-ended. We do NOT want access from or onto 1200 West from our neighborhood.

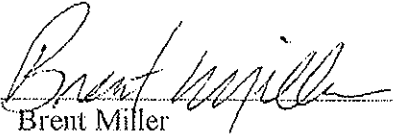
We fear that if these roads are constructed or left open, there will be a great increase in neighborhood traffic by those wanting to access Gas-N-Go, Trafalga and, especially, UVSC/UVU, and/or wanting to bypass Center Street, particularly if traffic is backed up at the proposed light at the future 1200 West intersection.

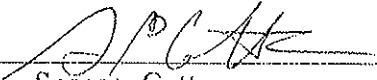
There are many children in our neighborhood and we fear for their safety, in addition to the other problems caused by increased neighborhood traffic if such access points were to be left open. There are two other roads by which we can access our neighborhood: 1000 West and 100 South.


Attached are: (1) the signatures of the neighbors who do NOT want these roads left open, (2) a corresponding map of their homes according to the number next to their signatures, and (3) our proposed change to the map draft. We desire to preserve our neighborhood, which we know is of great concern to the City of Orem and to the State of Utah. We do not feel that this request impinges on the rights of others or that it will be a hinderment to the movement of traffic through the City.

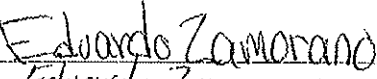
We hereby request your assistance in helping us preserve our neighborhood amidst these changes. Thank you.

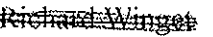
Residents of Deerfield Subdivision
Orem, Utah

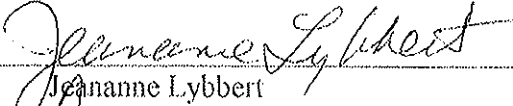
1. 
Brent Miller
72 South 1160 West

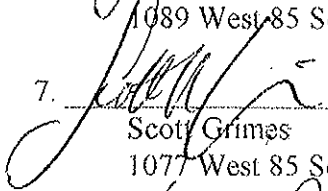
2. 
Spencer Cottam
1137 West 85 South

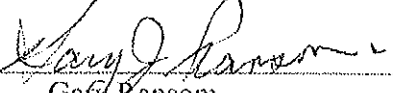
3. 
Junko Takeya
1125 West 85 South

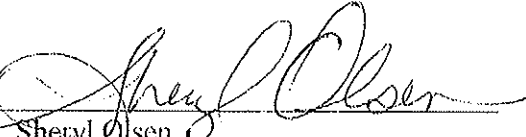
4. 
Eduardo Zamorano
1113 West 85 South

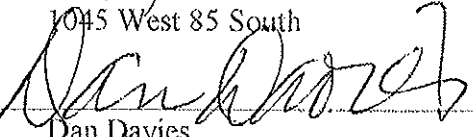
X. ~~~~
~~Richard Winget~~
~~1101 West 85 South~~

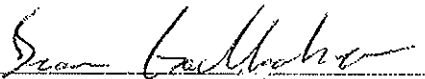
6. 
Jeannette Lybbert
1089 West 85 South

7. 
Scott Grimes
1077 West 85 South

8. 
Gary Ransom
1065 West 85 South

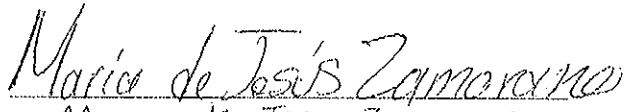
9. 
Sheryl Olsen
1045 West 85 South

10. 
Dan Davies
83 South 1050 West

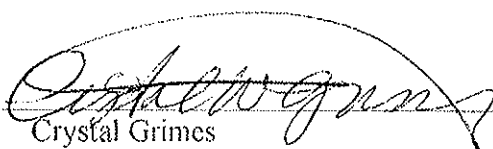
11. 
Sean Gallacher
69 South 1050 West


Pat Miller


Pamela Cottam


Maria de Jesus Zamorano

~~~~
~~Allison Winget~~


Crystal Grimes


Cheryl Ransom

AGREES BUT OUT OF TOWN
Caryl Davies FOR 2 WEEKS


Callie Gallacher

12. June Sutton
June Sutton
1039 West 40 South

13. Bart Hendrickson
Bart Hendrickson
1021 West 40 South

Tonya Hendrickson
Tonya Hendrickson

14. Mark Smith
Mark Smith
1070 West 40 South

Kelly Smith
Kelly Smith

15. AGREES BUT OUT OF TOWN
Graham Bilson
1084 West 40 South

Gailene Bilson
Gailene Bilson

16. Octavio Perez
Octavio Perez
1110 West 40 South

Guadalupe Perez
Guadalupe Perez

~~X~~ RENTAL - OWNER IN CA

~~~~~

1122 West 40 South  
18. Kenny Brandow  
Kenny Brandow  
1140 West 40 South

Julie Brandow  
Julie Brandow

19. Tom Wiltbank  
Tom Wiltbank  
1134 West 85 South

Sherri Wiltbank  
Sherri Wiltbank

20. Dan Barrett  
Dan Barrett  
1122 West 85 South

Jane Barrett  
Jane Barrett

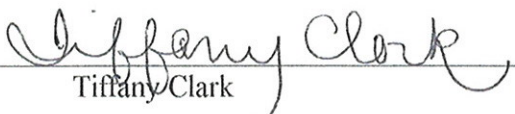
21. UNAVAILABLE  
Cindy Cooper  
1110 West 85 South

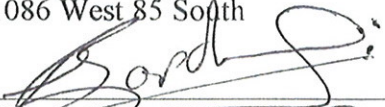
22. Shu Ch'en  
Shu Ch'en  
1098 West 85 South

Kelly Bowen  
Kelly Bowen

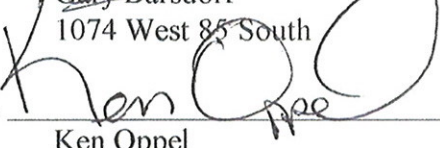
Max C Stinson  
Max C Stinson

23.   
Nathan Clark  
1086 West 85 South

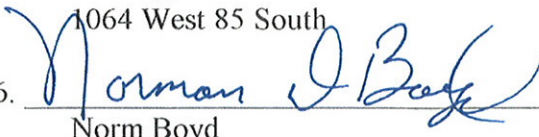
  
Tiffany Clark

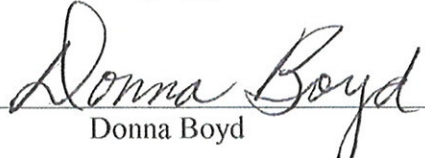
24.   
Gary Barsdorf  
1074 West 85 South


  
Shiralee Barsdorf

25.   
Ken Oppel  
1064 West 85 South

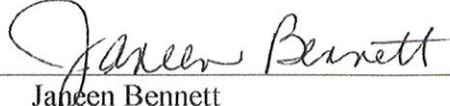
  
Cindy Appel

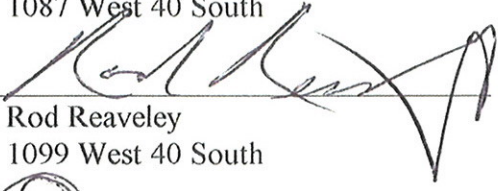
26.   
Norm Boyd  
1063 West 40 South

  
Donna Boyd


27.   
Richard Upstill  
1075 West 40 South

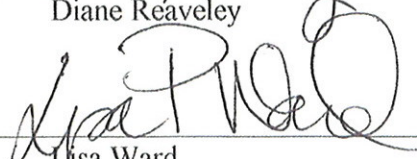
  
Cathie Upstill


28.   
Jaqueen Bennett  
1087 West 40 South

29.   
Rod Reaveley  
1099 West 40 South

  
Diane Reaveley

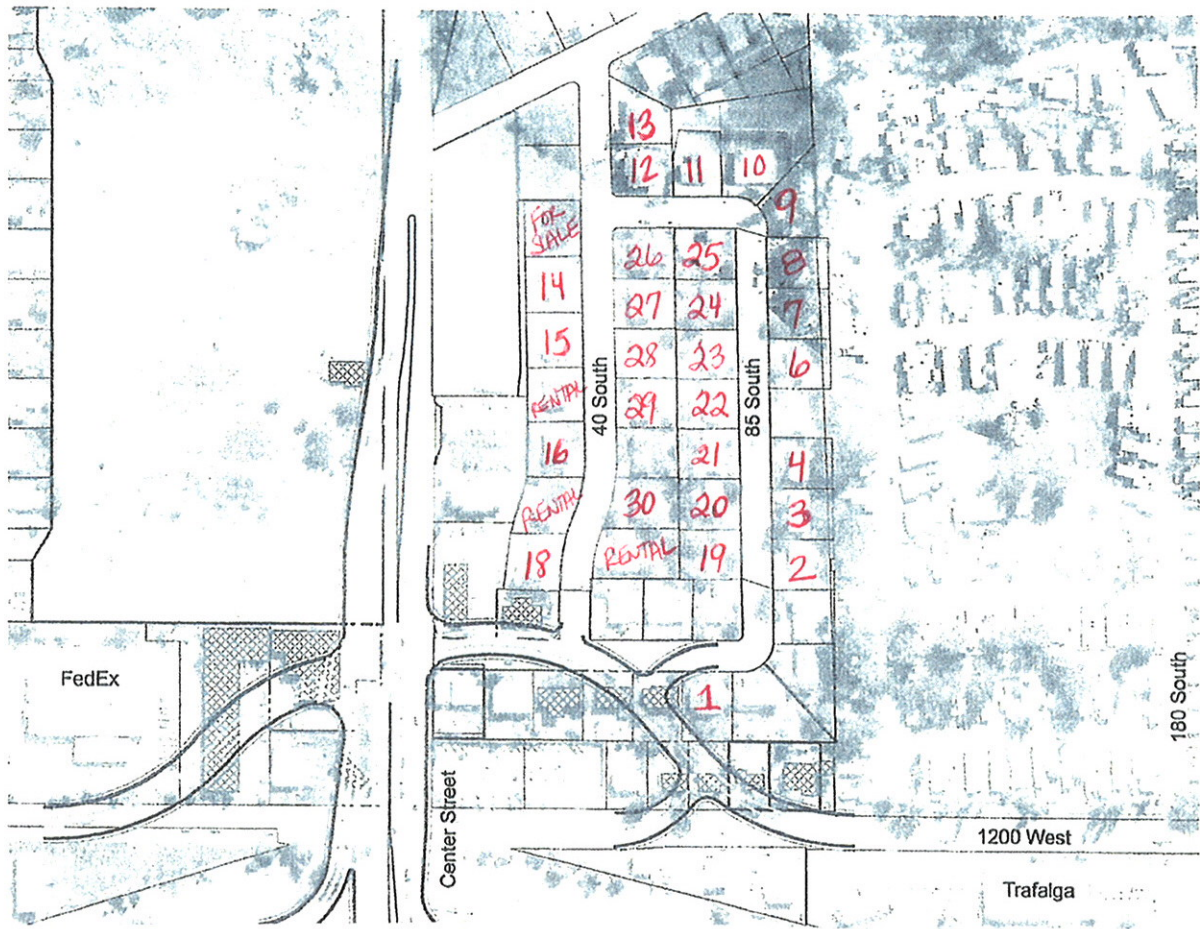
30.   
Shannon Ward  
1123 West 40 South

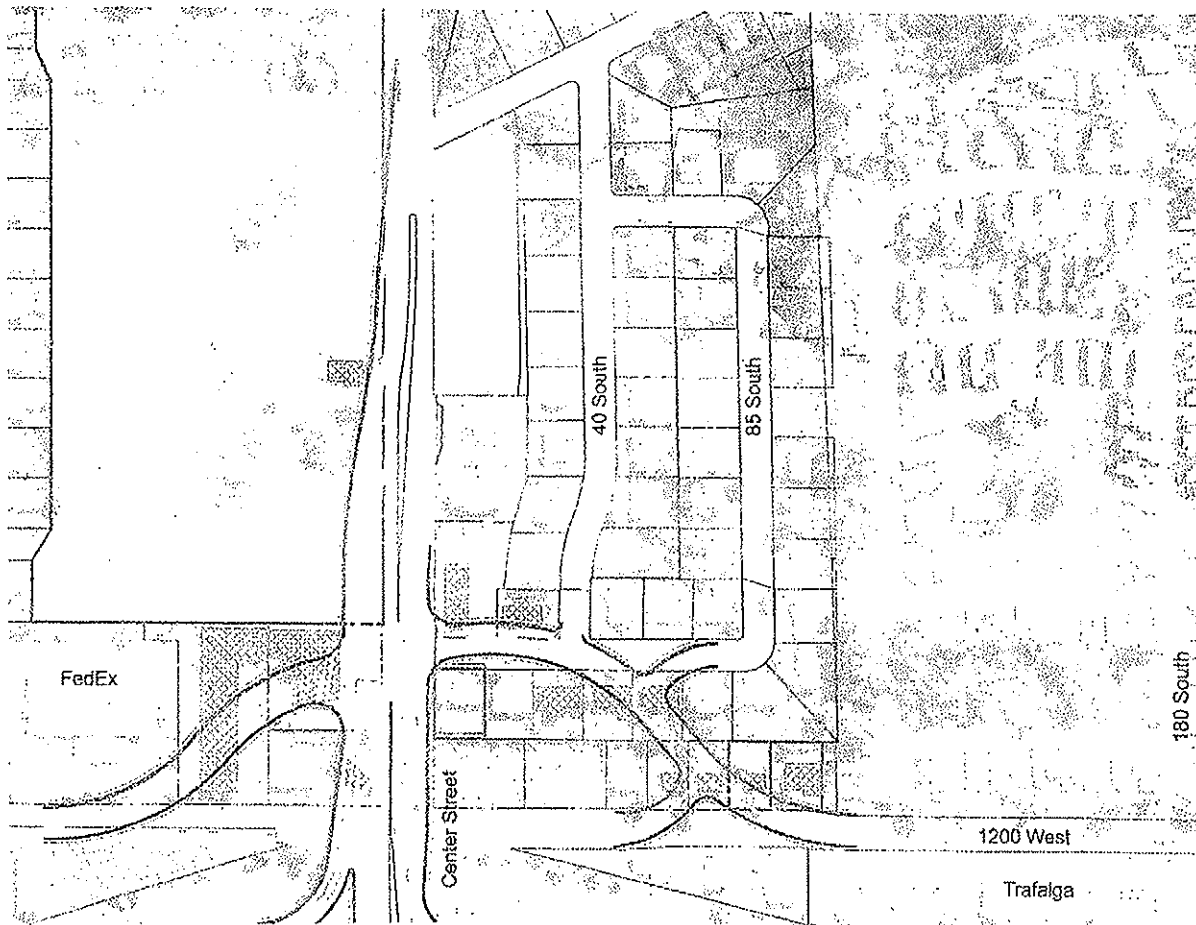
  
Lisa Ward

~~X~~   
~~Lex Hyden~~  
~~1147 West 40 South~~

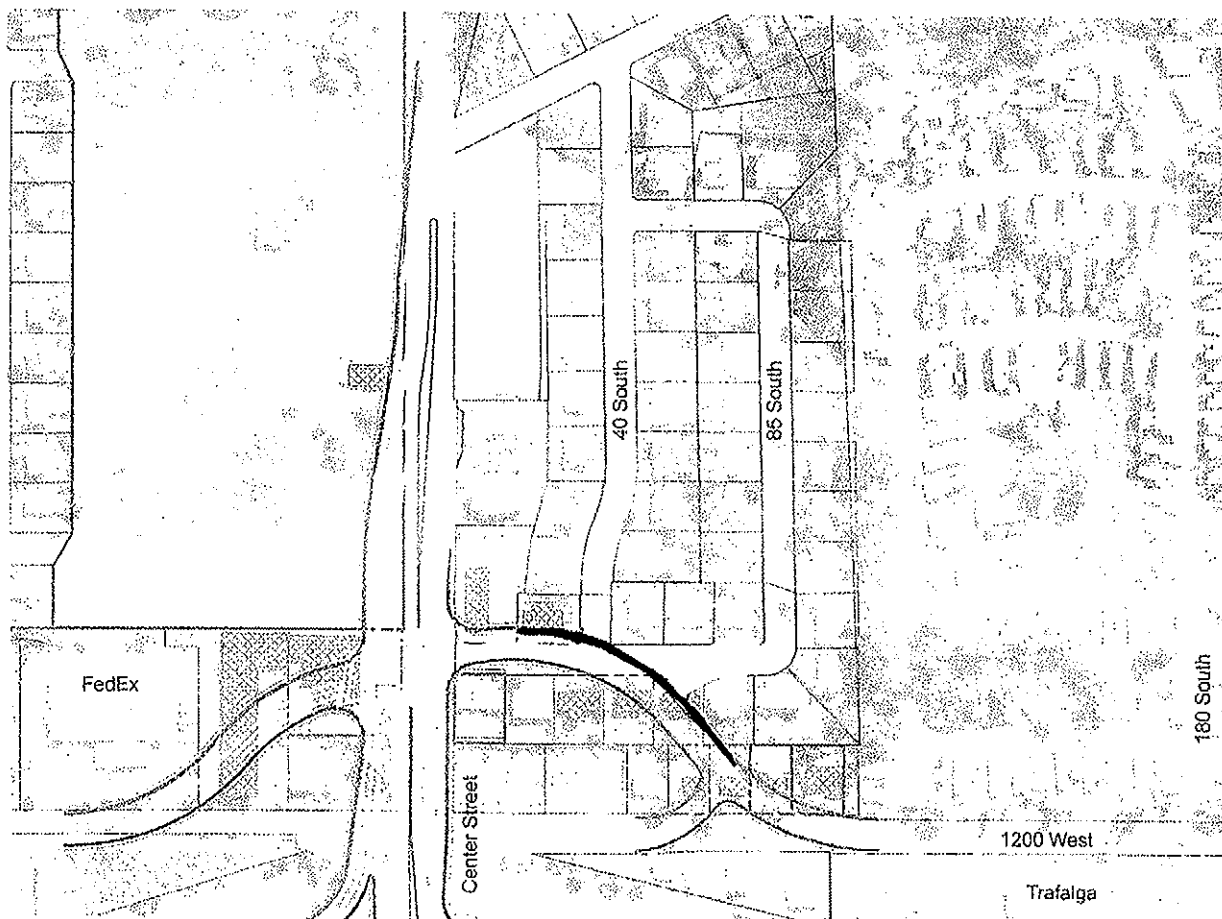
~~Beverly Hyden~~







CURRENT UDOT DRAFT



OUR REQUEST